



## SAMPLING AND ANALYSIS PLAN: SOIL STUDY, ADDENDUM 1 SAN JACINTO RIVER WASTE PITS SUPERFUND SITE

### **Prepared for**

International Paper Company

U.S. Environmental Protection Agency, Region 6

### **Prepared by**

Integral Consulting Inc.

411 First Avenue South, Suite 550

Seattle, Washington 98104

**March 2011**

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## LIST OF ACRONYMS AND ABBREVIATIONS

Abbreviation	Definition
Anchor QEA	Anchor QEA, LLC
bgs	below ground surface
COI	chemical of interest
CSM	conceptual site model
dioxins and furans	polychlorinated dibenzo- <i>p</i> -dioxins and polychlorinated dibenzofurans
DQO	Data Quality Objective
FS	Feasibility Study
FSP	Field Sampling Plan
HASP	Health and Safety Plan
HRMS	high resolution mass spectrometry
I-10	Interstate Highway 10
Integral	Integral Consulting Inc.
IPC	International Paper Company
LiDAR	light detection and ranging
MIMC	McGinnes Industrial Maintenance Corporation
PCB	polychlorinated biphenyl
PRG	Preliminary Remediation Goal
QA	quality assurance
QAPP	Quality Assurance Project Plan
QC	quality control
REV	reference envelope value
RI	Remedial Investigation
SAP	Sampling and Analysis Plan
Site	San Jacinto River Waste Pits Superfund site
SJRWP	San Jacinto River Waste Pits
SOP	standard operating procedure
TEQ <sub>DF</sub>	toxicity equivalent calculated with dioxins and furans only

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TOC	total organic carbon
UAO	Unilateral Administrative Order
UCL	upper confidence limit
USEPA	U.S. Environmental Protection Agency

## 1 PROJECT MANAGEMENT

### 1.1 Distribution List

Title	Name
USEPA Remedial Project Manager	Stephen Tzhone
USEPA QA Reviewer	Walter Helmick
Respondents' Project Coordinator and Anchor QEA Project Manager	David Keith
International Paper Co. Project Manager	Philip Slowiak
Integral Project Manager	Jennifer Sampson
Field Lead	Bill Lawrence
Laboratory QA Coordinator	Craig Hutchings
Database Administrator	Dreas Nielsen
Chemical Testing Laboratory Project Manager (Kelso)	Greg Salata
Chemical Testing Laboratory QA Manager (Kelso)	Julie Gish
Chemical Testing Laboratory Project Manager (Houston, HRMS analyses)	Darren Biles
Chemical Testing Laboratory QA Manager (Houston, HRMS analyses)	Andrew Biddle

### 1.2 Introduction and Task Organization

This Addendum to the *Sampling and Analysis Plan: Soil Study* (Soil SAP) has been prepared on behalf of International Paper Company (IPC), pursuant to the requirements of Unilateral Administrative Order (UAO), Docket No. 06-03-10, which was issued by the U.S. Environmental Protection Agency (USEPA) to IPC and McGinnes Industrial Maintenance Corporation (MIMC) on November 20, 2009 (USEPA 2009). The 2009 UAO directs IPC and MIMC to conduct a Remedial Investigation and Feasibility Study (RI/FS) for the San Jacinto River Waste Pits (SJRWP) Superfund Site in Harris County, Texas (the Site).

This document is an addendum to the Soil SAP. It addresses only the conditions, uncertainties, and investigation of soil to be conducted south of Interstate Highway 10 (I-10), and is submitted on behalf of IPC only. Each SAP for this Site consists of a Quality Assurance Project Plan (QAPP) and Field Sampling Plan (FSP), included as Appendix A, and several attachments. This addendum references the Soil SAP required by the 2009 UAO (Integral 2010) for all but selected sections of the main text and Appendix A, as described below. The Soil SAP for this Site (Integral 2010) and this Addendum were prepared consistent with

USEPA guidance and requirements for SAPs and QAPPs (USEPA 2001, 2002b),<sup>1</sup> as required by the 2009 UAO. They incorporate the input of agency reviewers, who provided comments on the initial draft.

Soil sampling and analyses described in this addendum will be conducted in full conformance with the procedures and methods described in the Soil SAP (Integral 2010). This addendum is intended to communicate details of the soil investigation to be conducted south of I-10 that differ from those of the investigation to be conducted north of I-10. The unique study components presented in this addendum include:

- Project Management (Sections 1.2 through 1.4, and 1.6 through 1.8)
  - Project Organization
  - Problem Definition and Background
  - Uncertainties and Data Gaps
  - Task Description
  - Data Quality Objectives
- Study Design and Methods (Section 2.1 and 2.2)
  - Sampling Design
  - Sampling Methods
- Field Sampling Plan (Appendix A)
  - Specific Sampling Methods Required for Soil Cores and Related Standard Operating Procedures (SOPs).

Those sections or subsections not named above are to be executed for this study as described in the Soil SAP (Integral 2010). Therefore, this addendum and the Soil SAP describe the means to achieve all quality assurance and quality control (QA/QC) requirements and documentation articulated by USEPA's guidance for preparation of QAPPs and FSPs (USEPA 2001, 2002b). USEPA's specifications, as described by Integral (2010), will be applied to the collection, analysis, QA review, data management, and reporting of the information

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<sup>1</sup> USEPA (2002b) is an update of the QAPP guidance cited in the 2009 UAO, which is USEPA (1998).

generated as described in this addendum. Together, these components describe the soil study for the area south of I-10, which will be used to inform the RI/FS required by the 2009 UAO.

This section reviews the organizational structure for activities associated with the soil study south of I-10, including project management and oversight, fieldwork, sample analysis, and data management. The organizational structure for this project is illustrated in Figure 1. Contact information for key personnel is provided in Section 1.3.

### 1.3 Project Organization

IPC has retained Integral Consulting Inc. (Integral) and Anchor QEA, LLC (Anchor QEA) to perform the activities associated with execution of the Soil SAP Addendum. Figure 1 illustrates the organization of personnel on the project. The primary contacts for USEPA and IPC are provided in the following table. A description of the project organization and contacts pertaining to this QAPP are provided after the table.

**USEPA and Respondent Project Managers**

Title	Name	Contact Information
USEPA Remedial Project Manager	Stephen Tzhone	U.S. Environmental Protection Agency, Region 6 1445 Ross Avenue Dallas, TX 75202-2773 (214) 665-8409 tzhone.stephen@epa.gov
International Paper Company Project Manager	Philip Slowiak	6400 Poplar Avenue Memphis, TN 38197-0001 (901) 419-3845 philip.slowiak@ipaper.com

To execute this study, Integral and Anchor QEA will conduct the fieldwork, database administration, coordination with the laboratories, and data analysis. The names and QA responsibilities of key project personnel who will be involved in sampling and analysis activities are provided below.

### Project Personnel Quality Assurance Responsibilities

Title	Responsibility	Name	Contact Information
Project Coordinator and Anchor QEA Project Manager	Coordination of project information and related communications on behalf of IPC with USEPA; liaison between USEPA project managers and respondent project managers	David Keith	Anchor QEA, LLC 614 Magnolia Avenue Ocean Springs, MS 39564 (228) 818-9626 dkeith@anchoragea.com
Integral Project Manager	Responsible for the successful completion of tasks and coordination with the Anchor QEA project manager and the IPC project manager to execute the study described in this SAP	Jennifer Sampson	Integral Consulting Inc. 411 1st Avenue South Suite 550 Seattle, WA 98104 (206) 957-0351 jsampson@integral-corp.com
		Greg Salata	Columbia Analytical Laboratory Kelso 1317 S. 13 <sup>th</sup> Avenue Kelso, WA 98626 (360) 577-7222 gsalata@caslab.com
		Darren Biles	Columbia Analytical Laboratory Houston 19408 Park Row, Suite 320, Houston, TX 77084 (713) 266-1599 dbiles@caslab.com
Anchor QEA and Integral Corporate Health and Safety Managers	Oversight of health and safety program for field tasks associated with RI/FS	David Templeton	Anchor QEA, LLC 1423 Third Avenue, Suite 300 Seattle, WA 98101 (206) 287-9130 dtempleton@anchoragea.com
		Eron Dodak	Integral Consulting Inc. 319 SW Washington Street Suite 1150 Portland, OR 97204 (503) 284-5545 edodak@integral-corp.com
Study Elements 1 and 2 Field Lead Integral	Field data collection and implementation of the Health and Safety Plan in the field	Bill Lawrence	Integral Consulting Inc. 411 1st Avenue South Suite 550 Seattle, WA 98104 (206) 230-9600 blawrence@integral-corp.com

Title	Responsibility	Name	Contact Information
Project Database Administrator	Database development and data management	Dreas Nielsen	Integral Consulting Inc. 411 1st Avenue South Suite 550 Seattle, WA 98104 (206) 957-0311 dnielsen@integral-corp.com
Laboratory QA Coordinator	Completeness of QA documentation and procedures; liaison between project personnel, chemical testing laboratories, and data validators and related QA communications with USEPA	Craig Hutchings	Integral Consulting Inc. 1205 West Bay Dr. NW Olympia, WA 98502 (360) 705-3534 chutchings@integral-corp.com
Laboratory QA Manager	Ensure quality of data; oversee laboratory QA and QC practices, records, and procedures; address nonconformity and corrective actions and reports; and coordinate efforts with laboratory project manager	Julie Gish	Columbia Analytical Laboratory Kelso 1317 S. 13 <sup>th</sup> Avenue Kelso, WA 98626 (360) 577-7222 jgish@caslab.com
		Andrew Biddle	Columbia Analytical Laboratory Houston 19408 Park Row, Suite 320, Houston, TX 77084 (713) 266-1599 abiddle@caslab.com

The responsibilities of the project manager and QA manager at the analytical laboratories used for this task are described in the Soil SAP.

## 1.4 Problem Definition and Background

On March 19, 2008, USEPA added the Site to the National Priorities List, and the 2009 UAO requires that an RI be conducted at the Site. The investigation described in this Addendum will address uncertainties about the following aspects of the Site as they relate to the potential soil contamination in the area south of I-10 (Area 4):

- The nature and extent of Site-related soil contamination
- The exposure of human and ecological receptors that may be using the Site and may have direct or indirect contact with contaminated soil

- The physical characteristics of the Site and physical processes governing fate and transport of Site-related contaminated soil.

Relevant background information on the Site, including the Site history and a conceptual site model (CSM) for the area of investigation north of I-10, can be found in Anchor QEA and Integral (2010). The CSM and Site history presented by Anchor QEA and Integral (2010) do not address historical waste disposal practices in areas south of I-10, or any related releases of hazardous substances, contaminant transport, or exposure pathways. USEPA is requiring that the Remedial Investigation include areas south of I-10 and IPC (but not MIMC) has agreed to perform the investigation in that area. The Soil SAP (Integral 2010) describes four soil collection areas and collection of background soils. This Addendum addresses the investigation to be performed in Area 4 only.

#### **1.4.1 Site Description**

The Site consists of impoundments, built in the mid-1960s for disposal of paper mill wastes, and the surrounding areas containing sediments and soils potentially contaminated with the waste materials that had been disposed of in these impoundments. Two impoundments, together approximately 14 acres in size, are located on a 20-acre parcel immediately north of the I-10 Bridge and on the western bank of the San Jacinto River, in Harris County, Texas (Figure 2).

Based on historical documents and aerial photographs, USEPA has identified an area south of I-10 to be investigated for soil contamination. USEPA's review indicates that an additional impoundment was constructed south of I-10, on the peninsula of land directly south of the 20 acre parcel, and also was used as a disposal area in the mid-1960s for paper mill waste similar to that disposed of in the two impoundments north of I-10. A Texas State Department of Health inspection report dated May 6, 1966 describes a pond south of the highway in a drawing, and states that it is approximately 15 to 20 acres in size (TSDH 1966). Figure 2 shows both the 1966 perimeter of the impoundments north of I-10, and the potential area of investigation of soils south of I-10. A discussion of the perimeter of the impoundment south of I-10 and related uncertainties is presented below.



USEPA has not identified any evidence of releases or threatened releases of hazardous substances from the south impoundment. Sediment samples were taken in the Old River area south of I-10, adjacent to and to the west of the south impoundment, as part of the April 2010 approved *Sampling and Analysis Plan: Sediment Study San Jacinto River Waste Pits Superfund Site* (Integral and Anchor QEA 2010). Results from the sediment sampling indicate that sediments from the three stations directly adjacent to the southern impoundment area are not contaminated with polychlorinated dibenzo-*p*-dioxins and polychlorinated dibenzofurans (dioxins and furans) at levels greater than those found in sediment from the upstream background area sampled at the same time (Figure 3). In a fourth sample further downstream, 2,3,7,8-tetrachlorodibenzo-*p*-dioxin was not detected in sediment, and the toxicity equivalent (TEQ<sub>DF</sub>) concentration was also within the range of upstream background (Figure 4). These data suggest that dioxins and furans have not been released from the south impoundment to the adjacent aquatic environment. A number of uncertainties remain, and will be addressed by the soil sampling program described in this SAP Addendum.

#### *1.4.1.1 Impoundment Location and Configuration*

Multiple aerial images of this area of the Site have been analyzed to determine the location and history of the impoundment south of I-10. These images, from 1962, 1964, 1966, 1970, and 1973, are presented in Appendix B along with key historical documents (TSDH 1966; McGinnes 1966). Review of the aerial photograph from 1964 indicates that an impoundment south of I-10 was constructed by forming berms adjacent to the shoreline of the peninsula south of I-10 separating the main channel of the San Jacinto River and the Old River (Appendix B). This is consistent with the impoundments north of I-10, which were constructed in 1965 by forming berms within the estuarine marsh (Anchor QEA and Integral 2010). In addition, USEPA has provided an interpretation of the aerial photograph from 1964 showing a possible perimeter of the south impoundment (13.4 acres), as well as an interpretation of an historical drawing included in the TSDH (1966) inspection report dated May 6, 1966 (22.8 acres). The larger of these two perimeters was used to define the area of the soil investigation (Figure 2).

Both of these possible impoundment perimeters are shown in Figure 5. An alternative interpretation of the TSDH (1966) drawing (20.9 acres) is also shown in Figure 5. This alternative interpretation is based on the appearance of roads on aerial photographs from 1964 and 1973 that suggest a somewhat different shape than that proposed by USEPA. Finally, an aerial photograph from October 16, 1966 (Appendix B) shows an area south of I-10 that appears to be covered by liquid; this fourth possible perimeter (7.9 acres) is also shown in Figure 5. A drawing included in a July 21, 1966, document (McGinnes 1966) seeking a permit from the state to drain the liquid contents of the southern impoundment into the Old River, west of the peninsula of land south of I-10, depicts an area that is similar in shape and location to the wetted area shown in the 1966 aerial photograph.

#### *1.4.1.2 Waste Disposal and Waste Characteristics*

In 1965 and 1966, pulp and paper mill wastes (both solid and liquid) were reportedly transported by barge from the Champion Paper Inc. paper mill in Pasadena, Texas, and unloaded at the Site into the impoundments, where the waste was stabilized and disposed (TSDH 1966). The excess water from the impoundments was pumped back into barges and taken off the Site. The Champion Paper mill used chlorine as a bleaching agent, and the wastes that were deposited in the impoundments north of I-10 have been found to be contaminated with dioxins and furans and some metals (TCEQ and USEPA 2006); additional discussion of the chemical constituents typical of materials like those deposited in the impoundments is provided in Section 1.5 of the Sediment SAP for this Site (Integral and Anchor QEA 2010) and in Appendix C of the RI/FS Work Plan (Anchor QEA and Integral 2010). The impoundments north of I-10 were used for waste disposal from September 1965 through late 1966.

Currently available information about the area south of I-10 is not very detailed but indicates that wastes deposited in the south impoundment may also have originated from the Champion Papers Inc. paper mill, and that the impoundment was used for “stabilization” of liquid wastes (McGinnes 1966). “Stabilized waste water and rain water” are the subject of the McGinnes (1966) permit request. Stabilization may have involved allowing solid waste materials to settle from liquid effluent prior to removal or draining of liquids off the top of

the pond. The quantity and spatial distribution of any solid wastes that may remain in the area south of I-10 are unknown.

#### **1.4.1.3      *Changes Over Time***

Physical changes at the Site in the 1970s and 1980s, including regional subsidence of land in the area due to large scale groundwater extraction, and sand mining within the river and marsh to the west of the impoundments north of I-10, have resulted in partial submergence of the impoundments north of I-10 and exposure of the contents of these impoundments to surface waters. Historical aerial photography does not indicate that any part of the land south of I-10, or any southern impoundment, has been submerged as a result of subsidence.

To determine the temporal evolution of the impoundment south of I-10, aerial photographs of this area from 1962 through 1973 were examined by IPC (Appendix B). In their comments on the draft document, the agency reviewers have provided an alternative interpretation, provided in its entirety in Appendix C. Analysis by IPC of historical photographs results in the following observations:

- **No impoundment existed in 1962.** The aerial photograph from 1962 indicates the absence of any impoundments at that time.
- **The perimeter berms of the southern impoundment never formed a complete enclosure.** The photograph from 1964 shows constructed berms adjacent to the western shoreline of the peninsula south of I-10. There is no berm visible along the southern or southeastern edges of this area in 1964. The eastern berm is shorter than the western berm, extending only about half the length of the western berm, and apparently trending southeastward for a short distance at its southern extent, ending in the middle of the peninsula. Photographs in subsequent years do not show southern or southeastern berms.
- **The topography in 1964 can be discerned.** On the basis of apparent liquid pooling around the edges of the impoundment in 1964, it appears that the interior of the impoundment was elevated above the edges that parallel the berms. This configuration is consistent with a construction process involving excavation of soils and use of the sidecast to create the berms directly adjacent to the excavated area. In this type of process, the excavated area directly adjacent to the berms is deepest, and

the area in the middle is undisturbed and remains at a somewhat higher elevation. Because excavation would have lowered the elevation of the excavated area (directly adjacent to the newly formed berms), there is what appears to be liquid visible in 1964, which could be storm water, water upwelling from the shallow groundwater environment, or wastewater that was deposited there. The interior section of the impoundment also has significant vegetation cover in 1964.

- **Vegetation within the 1964 impoundment resembles vegetation outside of it, and resembles vegetation in 1962.** In the 1964 aerial photograph, the vegetative conditions within the berms are the same as those to the east of the eastern berm. The vegetative patterns in the 1962 aerial photograph, prior to any apparent berm construction, are the very similar to those in 1964. If the entire area defined by the larger of USEPA's two estimated perimeters (Figure 5) had been flooded by liquid waste between 1962 and 1964, vegetative impacts would be observable as changes between 1962 and 1964, but no changes are apparent.

- **There is no indication that an eastern berm existed at the location of the eastern edge of the larger of USEPA's two estimated impoundment perimeters (Figure 5).**

Comparisons between the 1962 and 1964 aerial images reveal that the same bright linear feature existed in both images along the eastern edge of the larger of USEPA's two estimated impoundment perimeters. This feature is most likely a roadway rather than a berm primarily because its existence predates (1962, Figure B-1) any impoundment construction (1964, Figure B-2) in this area. It is shown as a road on a 1967 U.S. Geological Survey topographic map (see Figure 2-21 of the RI/FS Work Plan). This road appears to be the only access way to a structure near the eastern shore of the peninsula, which is visible in the same location in the aerial images starting in 1962 through 1970 (Appendix B). Moreover, if this structure were a berm, its construction would have resulted in the digging of a parallel trench, as evidenced by the berm-trench feature visible in the 1964 aerial image (Figure B-2) along the western edge of the impoundment. No such trench, depression or accumulation of water appears alongside this roadway in any of the aerial images 1962-1973 (Appendix B).

- **The flooded area visible in the aerial photograph from 1966 is consistent with a drawing of the southern impoundment by McGinnes (1966).** Available aerial photographs are consistent with the July 21, 1966, permit request by McGinnes

(1966) in two important ways: the timing of liquids being present in the south impoundment (middle of 1966) and the shape of the ponded area. An aerial photograph from October 16, 1966, shows an area south of I-10 apparently covered by liquid, roughly corresponding in length to the length in the north–south direction of the eastern berm visible on the 1964 image. The McGinnes (1966) permit request shows a drawing of the pond that is the subject of the request that appears as a simple rectangular shape with rounded corners. This drawing strongly resembles both the shape and location of the pond shown in the 1966 photograph, although the photograph shows the southern and southeastern perimeters of the ponded area as irregular, while the drawing shows a regular rectangular shape throughout.

- **The topography of the impoundment in 1964 is very similar to the topography in 1973.** Available aerial photographs suggest that the impoundment south of I-10 was not filled to capacity with solid waste and may have contained only limited amounts of contaminated solids. Evidence to support this interpretation is in the aerial images from 1970 and 1973. An aerial photograph from 1970 shows ponding in the same area that shows ponding in 1964, indicating that the topography within that impoundment was the same in 1970 as it was in 1964. The 1973 aerial photograph shows a depression in the northern end of the perimeter traced from the 1964 photograph by USEPA that strongly resembles the 1964 condition in the same area. Given that the disposal of paper mill wastes at the Site ended in the 1960s, consistencies in topography between 1964 and 1970 and 1973 strongly suggest that solid waste deposits in the impoundment south of I-10 are likely limited in volume. These analyses and the comparison of the 1964 and 1973 aerial images (Appendix B) also suggest that the impoundment south of I-10 remained contained within the berms of the original 1964 construction throughout its history, and therefore that the lateral and vertical extent of any solid wastes deposited in the area during the 1960s is likely limited to the U-shaped wetted area visible in the 1964 aerial photograph.

More recent data, including several aerial photographs since 1973 and the 2008 light detection and ranging (LiDAR) data (HGAC 2008) show that the site of the impoundment south of I-10 is currently a mixed-use commercial environment (Appendix B). Comparison of the 1964 perimeter with recent topographical information shows that the original 1964 berms are no longer present and that the area once used for waste disposal has been graded

into parking lots and building sites (Figure B-7). Beginning in the 1970s, much of the peninsula south of I-10 underwent substantial physical change due to road development, filling and excavation along the western shoreline and building development. In the 2008 LiDAR topographic imagery (Appendix B), a relatively elevated feature or mound is apparent at the northern extremity of the historical (1966) wetted perimeter (Figure B-7). Its shape does not resemble the original perimeter berm, and it is not in the same location as the original perimeter. Grading for building construction and parking lots within this area may have resulted in the creation of this mound. In this context, there is a potential that historical material deposited within the impoundment or soils contaminated by liquid wastes were disturbed during grading and construction and that contamination may occur within this mound.

The alternative interpretation of the Site history was provided in agency comments on the draft of this document, which are provided in Appendix C. This alternative interpretation indicates that, in light of limits to the available documentation and photographs of the area, there are still uncertainties about the site history.

#### **1.4.1.4      *Surrounding Land Uses***

Freshwater, estuarine, and marine habitats occur in the vicinity of the Site. Residential, commercial, industrial, and other land use activities occur within the preliminary Site perimeter and in the surrounding area. Residential development on the eastern bank of the river is present within 0.5 mile of the Site. The area once occupied by the impoundment south of I-10 is currently under industrial or commercial use, including use by a towing company, a shipbuilding company, and a shipyard. A sandy intertidal zone is present along the shoreline throughout much of the Site (Figure 2).

### **1.5      *Summary of Available Soils Data***

There are no data to describe surface or subsurface soil quality available for the area south of I-10. Site and background soils data relevant to the RI are described in Section 1.4.2 of the Soil SAP for this Site (Integral 2010).

## 1.6 Conceptual Site Model and Problem Definition

This Addendum to the Soil SAP specifically addresses potential transport and exposure pathways for the impoundment south of I-10. The overall CSM (Figure 6), and exposure CSMs for human and ecological receptors relating to the impoundments south of I-10, are illustrated in Figures 7 and 8, and discussed below.

An impoundment was constructed south of I-10 between 1962 and 1964 and received pulp mill wastes in the mid-1960s. The potentially affected soil is the subject of the investigation in Area 4. Major physical changes in the area since the impoundment was constructed include land subsidence due to groundwater withdrawal in the 1960s and 1970s, as well as industrial and commercial activities involving shipping, track and road development, building construction, shoreline filling and excavation, and soil grading. Historical aerial photography suggests that the area affected by the waste impoundment is likely limited to an area that appears to have been flooded in 1966. The impoundment south of I-10 was not exposed to surface waters as a result of subsidence, and sediments to the west of the impoundments are not contaminated with dioxins and furans to levels above background, indicating that contamination from the former impoundment has not been released to the aquatic environment. Extensive tracking across the area could have mixed surface contamination, and grading of soils to build today's parking lots could have mixed historical waste deposits into surface soils, particularly at the northwest end of the peninsula south of I-10.

Contact with potentially contaminated soil in the area south of I-10 creates the possibility for exposure of ecological receptors and people using the Site to chemicals of interest (COIs). Ecological receptors and people using Area 4 of the Site also may be exposed to COIs from global, regional, and local sources that are unrelated to the paper mill waste deposited on the Site. Because the area along the perimeter of the impoundment south of I-10 has been the location of various industrial, shipping, and other commercial activities since the 1960s, people working in the area south of I-10 may be exposed to COIs in soil that are present, but not as a result of the disposal of paper mill wastes in the 1960s. Area 4 is occupied by active industrial and commercial properties, many of which are fenced and gated. For this reason, potential exposure to contaminated soil in Area 4 may be limited for people and ecological receptors. The low concentrations of dioxins and furans in sediments adjacent to and

downstream of the south impoundment indicate limited potential for transport of surface soils or soil contaminants from this area into the aquatic environment. Thus, current information suggests that processes of release of hazardous substances, transport mechanisms, and pathways leading to exposure likely do not include significant pathways to the aquatic and sediment environments, and that paper mill waste related contamination of soil in the area south of I-10 is limited to Area 4. Moreover, given that the volume of waste deposited in the area may be very low, the importance of the transfer of COIs to groundwater as a transport pathway is unknown. Transport pathways to the aquatic environment are also unknown. The results of the evaluation of historical information and recent sediment data can be summarized in the overall CSM for the impoundment south of I-10, presented in Figure 6.

The overarching issue to be addressed by the study described in this Addendum is whether COIs associated with paper mill wastes generated in the 1960s occur in the surface and subsurface soils of Area 4 and, if so, the nature and extent of their distribution in affected soils. Resulting data will be used to evaluate both the nature and extent of contamination, and exposures and risks to ecological and human receptors. Both the exposure and risk assessment, and characterization of background conditions in soil will inform the development of Preliminary Remediation Goals (PRGs), if evaluation of remedial actions for soils is determined to be necessary. Where groundwater wells may be installed for evaluation of groundwater quality beneath Area 4 (Groundwater SAP; Anchor QEA 2010), the chemistry, grain size, and lithology of soils from the well cores may be needed to facilitate interpretation of groundwater data, if it is collected.

## **1.7 Uncertainties and Data Gaps**

Uncertainties and data gaps for soils on the Site south of I-10 are discussed below. The soil study proposed in this document addresses the collection and analysis of new information to address the uncertainties concerning the nature and extent of contamination, exposure potential, and risks due to contamination of soils associated with the southern impoundment, and potential for ongoing or post-remediation recontamination of sediment as a result of surface transport of contaminated soil to the aquatic environment.



### **1.7.1 Nature and Extent**

There are currently no data to describe the chemistry of soils on the Site south of I-10. There is a gap in the soil data for appropriate characterization of the nature and extent of contamination in the upland areas south of I-10 that may have been affected by waste-associated COIs. This data gap will be addressed by a sampling design to define the location of any buried waste, and to address the vertical and lateral extent of related surface and subsurface contamination. The nature and extent evaluation is informed by the current understanding of the site physical conceptual model and by Site history.

The Site history suggests that concentrated waste materials, if present, are more likely to be within the area shown as excavated in the 1964 aerial photograph than elsewhere on the peninsula south of I-10. The specific location and vertical distribution of concentrated waste material is the most significant data gap. The degree to which any buried waste deposits, or soils contaminated by the presence of liquid wastes, are present at the surface is also a data gap. Finally, the relative importance of the paper mill waste as a source of COIs to soils south of I-10 is unknown. However, if the area most likely to contain concentrated wastes does not show significant contamination, and surface soils in this area do not show evidence of contamination by paper mill wastes, then the absence of information on soil chemistry elsewhere on the peninsula south of I-10 is not a data gap. Therefore, the area of the investigation is divided into Areas 4a and 4b (Figure 9), and the investigation will be conducted in two phases, described further below. Phase I will address data gaps related to nature and extent for Area 4a and 4b, and will determine if Phase II is needed. If so, the remaining uncertainties and data gaps for Area 4b will be determined in consultation with USEPA. Additional information to describe this process is provided in Sections 1.8 and 1.9.

Ancillary information required to interpret soil chemistry data (e.g., in comparisons between samples or between areas) include the total organic carbon (TOC) content of soils and the grain size distribution.

### **1.7.2 Human and Ecological Exposures**

Human and ecological receptors may be exposed to contaminated soils in upland areas. Four types of human receptors have been identified in the RI/FS Work Plan (Anchor QEA and

Integral 2010) for the baseline human health risk assessment: subsistence fisher, recreational fisher, trespasser, and recreational user. The area south of I-10 is developed and managed for commercial and industrial activity, and therefore industrial workers have potentially complete and significant soil exposure pathways via direct contact, which includes incidental ingestion and dermal contact. Trespassers may also be exposed to COIs in soil south of I-10. The ecological exposure CSM indicates that there are no complete exposure pathways to soil for benthic invertebrates and that the existence of an exposure pathway to aquatic organisms could exist. Ingestion of soils and biota that have been exposed to soils is a complete and significant pathway for reptiles, birds, and mammals, and direct dermal contact and inhalation exposure to these receptors are considered potentially complete but minor. Because there are currently no data to describe COIs in soils on the Site, information required to evaluate baseline exposures of workers coming into contact with soils in the upland area south of I-10 potentially affected by the impoundments is needed. Information is also required to evaluate baseline exposures of ecological receptors coming into contact with surface and shallow subsurface contaminated soils. Whether there are significant uncertainties and data gaps related to complete exposure pathways to or within the aquatic environment can be addressed after initial sampling and data analysis.

As for the nature and extent evaluation, characterization of soil-related exposures to COIs potentially attributable to the waste stored in the impoundments requires information on the soil-related exposures of COIs from background areas. Information on COIs in background soil from off-Site areas (Integral 2010) is also considered a data gap.

### **1.7.3      *Physical CSM and Fate and Transport Evaluation***

Because upland soils may have surface contamination, processes of erosion could transfer COI-contaminated soils back into the aquatic environment, potentially contaminating surface water and sediments adjacent to the uplands. For the evaluation of remedial alternatives, information on the potential transfer pathways for COIs from uplands to the aquatic environment is needed. Concentrations of COIs in soils, and the physical transfer pathways for potentially contaminated soils to the aquatic environment will be required to characterize the extent of potential transfer of COIs via erosion, and the spatial distribution of areas where soil deposition could affect sediment quality. Therefore, in addition to data

gaps for COIs in soils in the upland areas south of I-10, the specific hydrologic pathways that could facilitate the transfer of soils into the aquatic environment via surface runoff are unknown. Information on potential surface transport pathways based on the topography of Area 4 is a data gap.

An additional data gap relating to this study element is data for the physical characteristics and chemistry of soils within cores of groundwater monitoring well pairs that may be installed to evaluate the chemistry of groundwater. A Groundwater SAP Addendum that describes a groundwater sampling program to determine whether COIs from the Site are present in groundwater underneath the impoundments south of I-10 will be developed if extensive subsurface soil contamination is identified by this study. Soil lithology, grain size distribution, and chemistry data from the locations where the wells would be drilled may be needed to interpret the groundwater data.

#### **1.7.4 Engineering Design Evaluation**

Until the nature and extent, potential for exposure, and potential for surface transport are better characterized, data gaps relating to engineering design cannot be defined. Any need for additional soil data relating to an engineering design evaluation will be addressed in an addendum to the Soil SAP.

### **1.8 Task Description**

The soil study will address data gaps by generating new data for soil chemistry for Area 4 of the Site, which is south of I-10. The soil study will be conducted in two phases:

- **Phase I.** The Phase I soil investigation is described in this Addendum and has three objectives:
  - Identify the specific location of historically deposited paper mill waste material
  - Develop sufficient information to characterize exposure of human and ecological receptors to soil-related contamination
  - Provide information necessary to determine whether Phase II is necessary.
- **Phase II.** Performance of the Phase II investigation will depend on the outcomes of Phase I. If Phase I does not identify areas of significant surface or subsurface

contamination of soils with paper mill wastes, Phase II will not be conducted (decision points are specified in Section 1.9). If significant paper mill waste-related contamination is identified, IPC will meet with USEPA to discuss the results and determine whether Phase II is necessary, and will work in consultation with USEPA to define uncertainties and data gaps to be addressed. If necessary, Phase II will likely include additional sampling across Area 4b for nature and extent and exposure assessments, and may also include groundwater sampling.

Within this framework, the soil study to be conducted south of I-10 consists of a series of tasks, to be executed by Integral and Anchor QEA on behalf of IPC and in consultation with USEPA:

- Agreement on the Phase I study design and finalization of a complete Soil SAP Addendum that addresses the area south of I-10
- Success in gaining access to private properties affected by the study design
- Fieldwork to collect the required soil samples, and appropriate execution of contingency plans as needed for conditions in the field
- Effective communication of modifications to the SAP during sampling, development of a consensus view of the means to address required changes, and employment of contingencies and alternatives identified during the field sampling
- Effective processing, handling, shipment, and analyses of soil samples, all of which conform to specifications of the Soil SAP and this SAP Addendum
- Complete documentation of sample collection, deviations from the SAP, field activities and observations, sample processing and shipping, chain of custody requirements, and analytical procedures
- Validation of soil chemistry and conventionals (organic carbon and grain size) data according to specifications in this SAP
- Complete and timely loading of validated data into the project database, and dissemination of the data to USEPA and interested parties.
- Analysis and discussion of Phase I results with USEPA, and identification of uncertainties and data gaps and appropriate objectives for Phase II, if necessary.

The soil study will address data gaps by generating new information relating to three of the four study elements that have been defined for the RI/FS (Anchor QEA and Integral 2010):

- Study Element 1: Nature and Extent Evaluation. Data will be used to locate buried soils with significant contamination by paper mill wastes, if any, and to characterize the nature and extent of COIs south of I-10 in soils potentially affected by waste handling in areas south of I-10.
- Study Element 2: Exposure Evaluation. Data will be used to evaluate the potential ecological and human exposures and related health risks resulting from contamination of soils potentially affected by paper mill waste handling in areas south of I-10.
- Study Element 3: Fate and Transport Evaluation. Topographic data will be used to identify physical transport pathways and to evaluate the potential for transport of COIs in soil to the aquatic environment. Soil chemistry, lithology, and grain size data may be needed to evaluate the potential for transport of COIs in soil to groundwater within the Site, if a groundwater study is needed.

Completion of Study Elements 1 through 3 (as described in this document) will allow determination of whether significant contamination is present, evaluation of the nature and extent of contamination of soils with COIs, determination of whether COIs in soils are associated with unacceptable risks to human and ecological receptors, and determination of whether COIs may be transferred from the uplands areas to the aquatic environment. After these evaluations are complete, a decision will be made to determine if additional data gaps and uncertainties remain for Area 4b; any resulting sampling will be preceded by a written plan that describes the forthcoming work but that references existing SAP documents. Following completion of the soil study, a decision will be made to determine whether remediation of soils is required, and if so, whether soil data generated by this study are sufficient to support design of remedial actions. If additional sampling is required, then additional Soil SAP addenda will be prepared to describe the approach and requirements of Study Element 4: Engineering Construction Evaluation.

Data Quality Objectives (DQOs) for each element as they pertain to the impoundments south of I-10 and related soil contamination are discussed in Section 1.9. The study design is described in greater detail in Section 2.1. Analytes for all soil samples for the exposure evaluation include COIs (Tables 1 and 2).

Sampling of soil for Phase I will take place in the first quarter of 2011 (Anchor QEA and Integral 2010), unless other arrangements regarding the sampling period are made in consultation with USEPA.

## **1.9 Data Quality Objectives**

This section presents a summary of the DQOs for soil sampling south of I-10 to evaluate nature and extent, human health and ecological exposure, and the potential physical transport pathways of soils to the aquatic environment or to groundwater. DQO discussions for Study Elements 1 and 2 are combined because the sampling objectives and analysis plans for these two study elements are integrated for soils. These DQOs have been prepared consistent with USEPA (2006) guidance. Establishing DQOs assures that data generation and sampling will be focused on the goals of the RI/FS and will be sufficient to address those goals. The DQO summaries in the following subsections include, for each study element, a statement of the problem, components of the sampling design necessary to support the analytical or interpretive approach, and a description of the analytical approach to be followed.

### **1.9.1 DQOs for Study Elements 1 and 2: Nature and Extent Evaluation and Exposure Assessment**

The RI/FS is being undertaken to address contamination of sediments and soil within and in the vicinity of the impoundments at the Site (Figure 2) and to address contamination of other environmental media that have been in contact with contaminated media at the Site. Soils at the location of the impoundment south of I-10, or where paper mill waste was handled in that area, may be contaminated with COIs. To effectively plan for any remedial actions that might be required, the spatial and vertical extent of soil contamination will be evaluated, at least in part, by comparison of soil data to the appropriate reference envelope value (REV), and to concentration-based PRGs for soils.

The RI/FS will address exposures of human and ecological receptors associated with contamination of Site soil that may have resulted from activities in the impoundments south of I-10 related to disposal or handling of paper mill waste, and risks associated with soil contamination within this area. The exposure evaluation and risk assessment will support

planning for Phase II soil investigation, and for remedial actions, if needed. To do so, the degree of contamination of surface soils relative to appropriate risk-based screening levels will be evaluated. This section presents the technical rationale and general approach for conducting the evaluation of human and ecological exposures to COIs in soil from Area 4a and 4b of the Site.

#### *1.9.1.1 Statement of the Problem*

Problems relating to characterization of the nature and extent of contamination, and to the exposure assessment, will be addressed by this study.

##### *1.9.1.1.1 Nature and Extent*

The primary problem to be addressed by Study Element 1 of the RI/FS (the nature and extent investigation) is uncertainty in the spatial and vertical extent of contamination in soils in the area of the soil investigation south of I-10, and the specific location of buried waste, if any, within Area 4a. A related problem to be addressed by Study Element 1 is the comparison of COI concentrations in Site soils with concentrations in soils from background areas to evaluate the relative contribution of wastes from the impoundments to any COIs identified in soil. The nature and extent evaluation, including characterization of soils in background areas, will address these problems and thereby facilitate the determination of whether a Phase II investigation is needed south of I-10, and if so, what uncertainties should be addressed. The overall investigation of Area 4 will facilitate selection and implementation of remedial approaches, if required.

Evaluation of the importance of Site-related COIs in Area 4 soils relative to atmospheric, global, and other sources requires characterization of contaminated soils using dioxin and furan signatures. Upland areas off-site, potentially subject to the same types of regional and atmospheric influences as soils at the Site (e.g., traffic on freeways), are relevant for assessing soil conditions and soil chemistry that could occur as a result of processes other than those that may have transferred materials from the impoundment to the surrounding soils. Although some soils data for urban, residential, forested, grassy, and transitional areas in the Houston area have been previously collected (Table 1 of Soil SAP), a larger number of samples is required for quantitative comparison (Gonzales 2007). Because of the potential

influence of traffic on rates of atmospheric deposition of dioxins and furans (University of Houston and Parsons 2006), and the proximity of the upland areas of the Site to I-10, background areas selected for collection of soils and comparison to the Site soils should be similar to this Site in terms of proximity to traffic. Samples from background areas that are as close to the freeway as the Site is will be collected to ensure that the influence of background sources on Site soils is characterized. Background sampling for this DQO is described in the Soil SAP (Integral 2010). Analytes for background samples will include all COIs for the purposes of this SAP Addendum.

Because Area 4 is adjacent to properties with ongoing industrial activities, and which have a history of industrial activity, soils in Area 4 may be contaminated with COIs from sources unrelated to disposal of paper mill waste in the 1960s. A problem to be addressed by this study is that both the nature and extent of contamination with COIs and the potential exposures of human and ecological receptors to COIs may be affected by sources unrelated to waste that may have been disposed in the impoundment. Background areas selected for the soil investigation (Integral 2010) may not provide relevant information for evaluating the role of neighboring industries that occur on the Site. Information on vertical chemistry profiles will be used to distinguish between COIs present as a result of paper mill waste disposal and those COIs present as a result of other industrial activities on the Site.

#### 1.9.1.1.2 Exposure Assessment

People working on the peninsula south of I-10 may be exposed to COIs in soil via direct contact (ingestion and dermal) with soils that may have been affected by handling of wastes or contaminated soil in the area south of I-10 (Figure 5). Characterization of risk in support of selection and implementation of remedial approaches requires information on contamination in soils accessible to people. One problem to be addressed by the soil study is uncertainty and data gaps regarding concentrations of COIs present in soil directly contacted by people working on this portion of the Site.

A related problem is the potential for ecological receptors at the Site to be exposed through direct ingestion of contaminated soil, or ingestion of biota that have been exposed to contaminated soil. The problem to be addressed in the ecological exposure evaluation is



uncertainty regarding the magnitude and spatial extent of exposures of birds, mammals, and reptiles to contaminants in Site soils.

For both human and ecological receptors, there is additional uncertainty regarding the exposures to COIs in soils of background areas. Information on exposures and risks to human and ecological receptors both at the Site and in background areas are needed in the evaluation of remedial options.

#### **1.9.1.2      *Sample Collection Design***

The soil sampling design for Study Elements 1 and 2 was developed in consideration of the following:

- Soil collection described by this Addendum addresses Area 4a and one location in Area 4b that is within USEPA's larger approximate impoundment perimeter (Figure 5). The need for new data was determined on the basis of the extent to which Area 4 could have been affected by handling of liquid and solid paper mill wastes, and by uncertainties as to the degree and location of significant sources of soil contamination originating with the disposal of paper mill wastes in the 1960s.
- Spatial distribution of sampling stations.
- Potential depth of COI contamination.
- Depth at which human and ecological receptors may contact soil.
- Total sample numbers necessary for exposure assessment.
- Characterization of background in off-site areas that are generally equivalent to the Site in terms of non-Site influences

#### **Soil Collection Areas**

To evaluate the nature and extent of contamination, the overall Site has been divided into four areas (Soil SAP; Integral 2010). Area 4 is the area of soil investigation that is south of I-10. Area 4 has been divided into two subareas based on the analysis of historical aerial photographs (Section 1.4): Area 4a and Area 4b (Figure 9). Area 4a is defined by the perimeter of the area that is flooded in the 1966 aerial image, and is considered to be the area most likely to be contaminated as a result of paper mill waste disposal in the 1960s. The area outside this perimeter and bound by the larger of the two hand drawings provided by USEPA

has been defined as Area 4b. Background areas are those defined as such in the Soil SAP (Integral 2010).

### **Spatial Distribution of Samples in Areas 4a and 4b**

Because the most significant uncertainty is the specific location of any buried paper mill waste, and because there is no soil chemistry data for the area south of I-10, a biased sampling design targeting the likely areas of contamination will be used. To characterize the nature and extent of contamination in soils south of I-10, 10 soil core stations are located to correspond to the most likely location of subsurface and surface contamination (Figure 10). Soil boring locations were targeted based on our current understanding of the site history and CSM (Section 1.4) and are placed to maximize the likelihood that the location and extent of any contaminated materials that may be buried will be identified. All soil cores will have a vertical resolution of 2 feet and all will include a sample from the final (lowermost) 5-foot increment (i.e., in native materials). In the seven northernmost cores in Area 4a, the top 2-foot increment will be subdivided into 0 to 6 inch (0 to 15 cm), 6 to 12 inch (15 to 30 cm), and 12 to 24 inch (30 to 60 cm) intervals. All samples in these seven cores will be analyzed for all COIs, TOC, and grain size. The rationale for the placement of these soil cores is detailed below:

- Four soil cores are targeted in the area likely to have had the lowest elevation in the mid 1960s, and which therefore would contain any solid waste deposits that exist.
- Two cores are located on a north–south transect along the centerline of the impoundment, with both intended to identify any waste deposits that may occur within the middle of the impoundment
- One core location is on the soil mound visible in the 2008 LiDAR data (Figure B-7 in Appendix B)

In the two cores at the southern end of Area 4a and the one to the east of Market Street in Area 4b, only 2-foot intervals will be sampled, and all samples from these three cores will be analyzed only for dioxins and furans, TOC, and grain size; the rationale is as follows:

- Two core locations in the southern extent of Area 4a, to determine if buried contamination occurs in these locations

- One core location in Area 4b, at the northern extent of the larger potential impoundment boundary identified by USEPA (Figure 5), to determine if buried contamination occurs in these areas

All 10 cores will have a vertical resolution of 2 feet plus one 5-foot increment within native materials; and seven will also provide information for surface and shallow subsurface soils for use in exposure evaluation. Analytical results will be used to describe the lateral and vertical extent of contamination within Areas 4a and 4b, and will address uncertainties about the eastern extent of possible surface and subsurface contamination.

To generate information sufficient for addressing human and ecological exposures, samples of surface and shallow subsurface soil will be collected from an additional three locations within Area 4a, and placed in between cores at the north end of Area 4a, and adjacent to the southernmost core in Area 4a. Locations were selected by visually estimating the distribution needed to provide reasonable spatial coverage of Area 4a.

### **Sample Depth and Analytes**

For consistency with the design described in the Soil SAP (Integral 2010) and the background samples, the design includes the following sample types:

- Surface and shallow subsurface soil samples will be collected from three stations at two depths, 0 to 6 inches (0 to 15 cm) and 6 to 12 inches (15 to 30 cm).
- Cores for nature and extent characterization will be collected to a maximum depth of 14 feet at nine stations throughout Area 4a and at one location in Area 4b, and with 2-foot intervals (as described above).
  - The topmost 2-foot interval in the seven northernmost cores in Area 4a will be subdivided as follows: 0 to 6 inches (0 to 15 cm), 6 to 12 inches (15 to 30 cm), and 12 to 24 inches (30 to 60 cm). All samples in these seven cores will be analyzed for all COIs, TOC, and grain size.
  - In the two cores at the southern end of Area 4a and the one to the east of Market Street in Area 4b, only 2-foot intervals will be sampled, and all samples from these three cores will only be analyzed for dioxins and furans, TOC and grain size.
  - Beginning at the location of soils that are evidently native materials, a final 5-foot increment will be collected from each of the 10 cores.

For analyses of polychlorinated biphenyls (PCBs) in these samples, soils will be analyzed for Aroclors, and an archive sample will be retained for analysis of PCB congeners, to be analyzed if a risk assessment is required. In these latter cores, sufficient sample volume will be collected at each increment and archived for possible future analysis of all of the other COIs except VOCs, which cannot be analyzed after extended periods of storage.

At all sample locations on the Site, and for all depth intervals except the lowest 5-foot increment, an additional 16 ounces of soil will be collected and archived. For the core locations, more than one soil boring may be required to collect sufficient mass for each interval. Should this be the case, additional boring locations will be placed within 1 foot of each other as needed to provide sufficient mass for potential analysis of all of the COIs. Samples from the same increment but collected from different cores will be mixed together prior to removing aliquots for specific analysis.

### **Number of Samples**

The overall design produces samples at 12 locations in Area 4a and 1 location in Area 4b, resulting in good spatial coverage and a high vertical resolution in areas most likely affected by paper mill waste disposal, as well as soil mixing that may have occurred since the 1970s (Figure 10). The 20 surface and shallow subsurface soil samples will meet the requirements for calculation of an upper confidence limit (UCL) for human health risk assessment for this area. In addition to surface soil samples, soil cores will be collected at 10 locations throughout Area 4a and at the north end of Area 4b, which will be used for both nature and extent evaluations and CSM refinement (Figure 10), and which will address the most basic uncertainty (i.e., whether a buried waste deposit exists). Counting all increments at all locations (assuming cores penetrate to a depth at which there is a clear distinction between increments on the basis of grain size, lithology or other indicators [e.g., plant fragments] indicating the presence of undisturbed native materials, or to 14 feet, whichever is less, and that an additional 5-foot increment is collected within the native materials), a maximum of 100 soil samples will be collected within Area 4.

## Background Conditions

Surface and shallow subsurface soils (0 to 6 inches [0 to 15 cm], 6 to 12 inches [15 to 30 cm]) in background areas (Figure 11) will be collected to allow comparison of soil samples from within the preliminary perimeter to background conditions as part of the nature and extent investigation. This sampling program is described in the Soil SAP (Integral 2010) for off-site background areas. Analytes for these samples include all COIs for the purposes of this SAP Addendum (PCBs will be analyzed as Aroclors, and archives will be retained in the event that a risk assessment involving PCBs is performed).

### 1.9.1.3 Analytical Approach

A summary of the analysis approach is provided by Figure 12. Study Element 1 includes the following distinct types of analyses:

- **Detection frequency.** The detection frequency of each COI in all 100 soil samples will be calculated. Chemicals that are detected in 5 percent or fewer samples will not be evaluated for human health risks, and their nature and extent will not be described. Detection limits will be at or below conservative screening levels (as provided in Appendix C of the RI/FS Work Plan [Anchor QEA and Integral 2010]).
- **Characterization of the lateral and vertical extent of contamination.** To characterize the nature and extent of contamination in surface and subsurface soils, all depth increments in cores, and both of the two depth increments in surface and shallow subsurface soil sampling locations will be submitted for chemical analysis. Concentrations of COIs and ancillary variables in all increments from the northernmost seven core and all surface sample locations within Area 4a will be quantified. Soil increments in the three remaining cores (two in Area 4a and one in Area 4b) will be analyzed only for dioxins and furans, TOC, and grain size. Results of chemical analysis of soils collected from background areas will be used to calculate an REV for each COI.
- **Comparison of Site soil conditions with background soils.** Evaluation of Site data relative to background conditions requires assessment of variability in background conditions. For this analysis, samples will be collected in the two surface intervals, 0 to 6 inch (0 to 15 cm) and 6 to 12 inches (15 to 30 cm), in 20 offsite background locations, as described in the Soil SAP (Integral 2010), and comparisons with Site data

will be made. Consistent with USEPA guidance for evaluation of background soils (USEPA 2002a), an upper 95th percentile or upper tolerance limit will be derived to characterize background conditions (i.e., REV).

- **Descriptive information on nature and extent of contamination, such as subsurface chemical profiles for each COI at each sampling location will be developed.** The lateral and vertical distribution of soil contamination will be described. The vertical distribution of COI concentrations at all locations will be evaluated qualitatively; vertical gradients will be used to interpret whether waste is present but buried, and whether contamination at the surface is the result of industrial activities not linked to paper mill waste handling (e.g., if a COI is present at the surface, but not elevated at the subsurface). For this latter evaluation, dioxins and furans will be considered an indicator of the influence of paper mill waste (RI/FS Work Plan, Appendix C).

Study Element 2 will include the following types of analyses (Figure 12):

- **Performance of risk based screens.** COI concentrations in each sample from surface and shallow subsurface increments will be compared to screening levels protective of human and ecological receptors. Those COIs with concentrations in a majority of samples that exceed screening levels will be addressed by a risk evaluation. Those COIs for which any stations do not exceed conservative screening levels will not be considered further.
- **Characterization of exposures to human and ecological receptors using the Site.** Sampling of soils for Study Element 1 will provide data that are useful for evaluating exposure of human and ecological receptors to surface and shallow subsurface soils, at the 0 to 6 inch (0 to 15 cm) and the 6 to 12 inch (15 to 30 cm) depth intervals, respectively. Surface and shallow subsurface intervals will be sampled at 10 locations in Area 4a where potential exposure to contaminants is most likely. The data from these samples will be used to calculate exposure point concentrations to represent the central tendency and reasonable maximum exposures of each COI in soil for use in the risk assessments, if necessary.
- **Comparison of exposures of human and ecological receptors to dioxins and furans in Site soils to those of background.** Exposures to soil contaminants on the Site will be compared with exposures at background locations to determine the extent to which Site soils pose an excess risk to people, reptiles, birds and mammals. Sampling of soils

in background areas for Study Element 1 (discussed in Integral 2010) will provide the necessary data for evaluation of background exposures.

Results of these analyses will be discussed with USEPA to determine whether a Phase II investigation is necessary, and to identify the remaining uncertainties that need to be resolved, if any, as shown in Figure 12.

### **1.9.2 DQOs for Study Element 3: Physical CSM and Fate and Transport Evaluation**

The RI/FS will provide information to characterize the potential movement of impoundment-associated contaminants in soils from uplands to the aquatic environment as a result of surface erosion. This information is necessary to determine whether soils could contribute to sediment contamination, and thereby to evaluate whether remedial actions are needed.

The RI/FS will also include a limited study of groundwater involving the installation of three groundwater monitoring well pairs in the vicinity of the impoundments north of I-10. A complete SAP for collection and analyses of groundwater has been submitted to USEPA (Anchor QEA 2010), and an addendum to this SAP will be developed to address groundwater sampling south of I-10 in phase II, if needed. For the study south of I-10, groundwater sampling will occur as part of Phase II only. It will be contingent upon the identification of significant contamination in soil south of I-10. If it becomes necessary to sample groundwater, wells will be installed at three locations, and soil samples will be collected from well cores and analyzed as described in the Groundwater SAP.

#### **1.9.2.1 Statement of the Problem**

The goal of Study Element 3 of the RI/FS is to determine primary physical and chemical processes controlling chemical fate and transport, and to use that information to refine the CSM for the Site. The problems to be addressed by the soil study pertain to:

- The topographical conditions of area south of I-10 that could facilitate transport of COI-contaminated soils from uplands to the aquatic environment

- The geological or chemical conditions that could result in contamination of groundwater with COIs.

#### 1.9.2.1.1 Topography of the Uplands

On the upland areas, if soils are contaminated with COIs originating from the impoundments, surface water runoff could erode soils into the aquatic environment. The topography of the uplands area within which soils will be sampled will determine the physical transport pathways that exist for the movement of soils to the aquatic environment.

#### 1.9.2.1.2 Soil Quality at Groundwater Well Locations

If significant subsurface soil contamination is identified, a problem relating to the understanding of fate and transport of COIs on the Site will be uncertainty about the subsurface geology and potential for COIs to enter groundwater. If a Phase II soil investigation is necessary, additional information on soil lithology and soil grain size at groundwater well locations will be obtained to address these uncertainties. Additional chemistry data may be needed to interpret results of groundwater sampling, if it occurs.

#### 1.9.2.2 *Sample Collection Design*

The sampling design for Study Element 3 in the area south of I-10 was developed in consideration of the following:

- The spatial and vertical resolution required to effectively describe possible surface water transport pathways on the uplands west of the impoundments

If a Phase II investigation involving groundwater sampling is required, the spatial distribution of groundwater wells will be considered in development of the groundwater sampling locations.

### **Surface Topography**

LiDAR data developed in 2008 and describing the surface topography of the Site at a resolution appropriate for developing surface flow paths has been purchased from the Houston-Galveston Area Council. Both vendor-provided surface descriptions (such as 1-foot



contour lines) and the bare-earth and all-return point data will be used to interpret the topography of the uplands west of the impoundments. Data will be interpreted using geographic information system software (ArcGIS) to interpolate a digital elevation model from the bare-earth point-return data and to perform an analysis of hydrologic flow paths. The digital elevation model will represent surface topography of the upland areas in 1-foot pixels, with a vertical accuracy of 0.22 foot. No field activities are currently anticipated or planned.

### **Soils at Groundwater Well Locations**

If a groundwater investigation is needed, three pairs of boreholes (one “shallow” and one “deep” in each pair) will be advanced in locations south of I-10 to enable the groundwater monitoring well pair installation, using an approach similar to that described in the Groundwater SAP (Anchor QEA 2010). If this is necessary, soil samples (at 5-foot intervals) will be collected from the deeper of the two cores during the process of establishing groundwater monitoring wells. These samples will be archived and will be analyzed only if the results of the groundwater sampling suggest that soil contamination may lead to groundwater contamination. Observations on soil lithology (color, grain size, consistency, etc.) will be recorded following visual examination during drilling and sampling activities if they occur; these soil samples will be inspected and logged in accordance with American Society for Testing and Materials D2488 *Standard Practice for Description and Identification of Soils (Visual-Manual Procedure)*.

#### **1.9.2.3 Analytical Approach**

The analysis of data to be collected for Study Element 3 includes development of models of hydrologic flow paths on the surface of area where impoundments are suspected to have occurred south of I-10, and use in interpretation of groundwater sampling results.

### **Surface Topography**

The ArcHydro extension in the ArcGIS software package will be used to delineate surface drainage flow paths of site topography. The 1-foot bare-earth digital elevation model grid will be used as input to produce a flow direction grid, in which grid cells indicate the flow direction defined by slope calculations using an eight-direction pour point model. The flow

direction grid will be used as input to produce a flow accumulation grid, which records the number of cells that drain to a specific cell in the grid. Flow paths will be defined from the flow accumulation grid with the use of threshold drainage areas. Flow accumulation grid cells greater than the threshold drainage area will be classified as flow paths and all cells less than the threshold will be interpreted as areas contributing to the flow paths. The resulting flow paths will identify dominant drainage flow patterns on the upland area.

### **Soils at Groundwater Well Locations**

The Groundwater SAP (Anchor QEA 2010) describes the analysis of groundwater chemistry. If a groundwater study is necessary, groundwater samples are collected, and groundwater quality is found to be potentially affected by surface conditions, soil lithography at each of the groundwater well locations will be used in the evaluation of possible transport pathways from surface to groundwater. Soil samples collected during groundwater well boring and archived for possible chemical analyses (from the Beaumont formation and below) will be analyzed if information on soil and sediment chemistry that will be produced as a result of Study Elements 1 and 2 (Section 1.9.1) are found to be insufficient to interpret the groundwater chemistry data. For example, the vertical distribution of COIs in soils, as well as the geologic structure underlying the south impoundment, can be evaluated using lithography, grain size, and chemistry data for subsurface soils.

## 2 DATA GENERATION AND ACQUISITION

This section provides a brief description of the sampling design and outlines the procedures for collecting soil samples. Details of soil sampling methods are provided in the FSP Addendum (Appendix A).

### 2.1 Sampling Design

The Phase I sampling design for soil (Table 3) south of I-10 is summarized as follows:

#### Soil Collection Areas

The soil collection area (Figure 9) includes:

- **Area 4a.** The area in which paper mill waste handling south of I-10 is most likely to have affected soil
- **Area 4b.** The area in which paper mill waste handling south of I-10 may have occurred and could have affected soil.

#### Soil Depth Intervals to be Sampled (Study Elements 1 and 2)

In Area 4a, soil samples will be collected at the following depth intervals:

- **Surface soil samples** will be collected from 0 to 6 inches (0 to 15 cm).
- **Shallow subsurface samples** will be collected from 6 to 12 inches (15 to 30 cm).
- **Two-foot resolution soil cores** at the seven northernmost core locations in Area 4a will be collected to the depth at which a clear distinction between increments on the basis of grain size, lithology, or other indicators is observed, indicating the presence of undisturbed native materials, not to exceed a maximum of 14 feet, whichever is less. The top 1 foot at these stations will be collected as 0 to 6 and 6 to 12 inch intervals; the second 1 foot interval will be collected from 12 to 24 inches. Samples will be collected at each subsequent 2-foot interval.
- **Two-foot resolution soil cores** will be collected at the two cores at the southern end of Area 4a and the one core to the east of Market Street in Area 4b to the depth at which a clear distinction between increments on the basis of grain size, lithology, or other indicators is observed, indicating the presence of undisturbed native materials, not to exceed a maximum of 14 feet, whichever is less. Only 2-foot intervals will be

sampled in these cores.

- **Five-foot increment at the base of each core** (within native materials) will be collected at the request of USEPA.

Characterization of the top 2 feet (0 to 60 cm) of soils at each 2-foot resolution core will be possible by calculating a depth-weighted concentration using the concentrations in each of the three individual surface intervals, weighted by the percent of the total depth represented by each interval depth.

For all soil samples collected for Study Elements 1 and 2, an archive sample will be collected at each depth interval.

### **Soil Depth Intervals to be Sampled (Study Element 3)**

If a Phase II investigation is necessary, at the location of deep groundwater wells, soil samples will be collected at 5-foot intervals from the top of the Beaumont formation and below during well boring. Soils will be composited across the full depth of the 5-foot interval and analyzed for grain size, as well as archived for chemistry as described in the Groundwater SAP (Anchor QEA 2010).

### **Sample Stations**

The following numbers of samples will be collected from Area 4:

- Surface and shallow subsurface pairs: 10 (from Area 4a)
- Cores with 2-foot intervals: nine from Area 4a and one from Area 4b

Locations of all of these stations are shown in Figure 10 and detailed in Appendix A.

## **2.2 Sampling Methods**

Sampling methods that will be used to collect the soil samples are presented in Section 2.2 of the Soil SAP (Integral 2010). Sampling methods are described in detail in the FSP (Appendix A of Integral 2010). This section specifically describes sampling methods required for collecting soil south of I-10 that differ from methods described in the Soil SAP.

### **2.2.1 Surface Soil Samples**

All surface soil samples will be collected as described in the Soil SAP (Integral 2010). Further details of the soil sampling methods, collection, and sample processing can be found in the FSP for the Site (Appendix A of Integral 2010). Locations of surface soil sampling stations are shown in Figure 10.

### **2.2.2 Soil Cores**

Soil core sampling activities will be conducted under the direction of an Integral or Anchor QEA representative, in accordance with the applicable sections of the SOPs attached to Appendix A. Coring equipment and services will be provided by a contractor, which will be determined after the final approval of this SAP Addendum. Geoprobe® drilling methods used to collect subsurface soil samples cores will be advanced to a depth at which there is a clear distinction between increments on the basis of grain size, lithology, or other indicators (e.g., plant fragments) indicating the presence of undisturbed native materials or to 14 feet, whichever is less.

#### **2.2.2.1 Geoprobe® Sampling**

Soil probes will be hydraulically pushed in 4-foot intervals to the target depth (refer to SOP SL-07). Samples will be collected using tube samplers equipped with new, clear polyethylene liners. The type of core to be collected is based on the depth increment: 2-foot intervals (Figure 10). Surface and shallow subsurface samples will also be collected at each of the seven northernmost core locations by separating or separately collecting the 0 to 6 inch interval. The second depth interval at these core locations will be collected from 6 to 12 inches below ground surface (bgs), and the third interval from 12 to 24 inches bgs. Subsequent samples will be collected from 2-foot intervals, with a final 5-foot increment at the base of each core (within native materials) as requested by USEPA. The cores will be observed and logged using the Unified Soil Classification System.

Two-foot resolution soil cores will be collected at two cores at the southern end of Area 4a and the one core to the east of Market Street in Area 4b, with a final 5-foot increment at the base of each core (within native materials) as requested by USEPA. The cores will also be observed and logged using the Unified Soil Classification System.

The soil samples will be removed from the plastic tubing using a decontaminated, stainless-steel spoon and placed into laboratory-cleaned, wide-mouth glass jars and sealed with Teflon™-lined lids. Samples will be placed in a cooler with ice and submitted to an analytical laboratory for analysis within 24 hours. Soil samples will be placed in jars and shipped for chemical analysis as shown in the FSP tables (Appendix A). The remaining samples will be archived. Quality control samples will be collected as described below. Boreholes will be abandoned by backfilling in accordance with Texas regulations.

### **2.3 Sample Handling and QA Procedures**

Sample handling and QC procedures are described in the Soil SAP Sections 2.3 and 2.5, respectively (Integral 2010).

### **2.4 Laboratory and Analytical Methods**

Laboratory and analytical methods are described in the Soil SAP in Section 2.4. Those methods needed in addition to the ones described in the Soil SAP are listed in Table 4.

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## TABLES

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**Table 1**  
**Chemicals of Interest**

Class	Chemical
<b>Dioxins/Furans</b>	
	Dioxins and Furans
<b>Metals</b>	
	Aluminum
	Antimony
	Arsenic
	Barium
	Cadmium
	Chromium
	Cobalt
	Copper
	Lead
	Magnesium
	Manganese
	Mercury
	Nickel
	Silver
	Thallium
	Vanadium
	Zinc
<b>Polychlorinated Biphenyls</b>	
	Polychlorinated Biphenyls
<b>Semivolatile Organic Compounds</b>	
	Acenaphthene
	Fluorene
	Naphthalene
	Phenanthrene
	2,4,6-Trichlorophenol
	2,4-Dichlorophenol
	Pentachlorophenol
	Phenol
	Hexachlorobenzene
	2,3,4,6-Tetrachlorophenol
	Carbazole
	2,4,5-Trichlorophenol
	Bis(2-ethylhexyl)phthalate
<b>Volatile Organic Compounds</b>	
	Chloroform
	1,2,4-Trichlorobenzene
	1,2-Dichlorobenzene
	1,3-Dichlorobenzene
	1,4-Dichlorobenzene
	1,2,3-Trichlorobenzene

**Table 2**  
**Chemicals of Interest, Analytical Concentration Goals, and Method Detection/Reporting Limits**

Class	Chemical	USEPA Regional Screening Levels - Industrial Based Soil Screening Level for Human Health <sup>a</sup>		Alternative Screening Level <sup>b</sup>	Method Detection Limit <sup>c</sup>	Method Reporting Limit <sup>c</sup>
		carcinogenic endpoint	non-cancer endpoint			
Conventionals						
	Percent moisture (percent)	NV	NV	NV	NA	NA
	Total organic carbon (percent)	NV	NV	NV	0.02	0.05
Dioxins/Furans (ng/kg)						
	1,2,3,4,6,7,8-Heptachlorodibenzo- <i>p</i> -dioxin	NV	NV	NV	0.0539	5
	1,2,3,4,6,7,8-Heptachlorodibenzofuran	NV	NV	NV	0.0482	5
	1,2,3,4,7,8,9-Heptachlorodibenzofuran	NV	NV	NV	0.0561	5
	1,2,3,4,7,8-Hexachlorodibenzo- <i>p</i> -dioxin	NV	NV	NV	0.0616	5
	1,2,3,4,7,8-Hexachlorodibenzofuran	NV	NV	NV	0.0688	5
	1,2,3,6,7,8-Hexachlorodibenzo- <i>p</i> -dioxin	NV	NV	NV	0.0500	5
	1,2,3,6,7,8-Hexachlorodibenzofuran	NV	NV	NV	0.0489	5
	1,2,3,7,8,9-Hexachlorodibenzo- <i>p</i> -dioxin	NV	NV	NV	0.0525	5
	1,2,3,7,8,9-Hexachlorodibenzofuran	NV	NV	NV	0.0521	5
	1,2,3,7,8-Pentachlorodibenzofuran	NV	NV	NV	0.0501	5
	1,2,3,7,8-Pentachlorodibenzo- <i>p</i> -dioxin	NV	NV	NV	0.0656	5
	2,3,4,6,7,8-Hexachlorodibenzofuran	NV	NV	NV	0.0490	5
	2,3,4,7,8-Pentachlorodibenzofuran	NV	NV	NV	0.0444	5
	2,3,7,8-Tetrachlorodibenzo- <i>p</i> -dioxin	NV	NV	NV	0.0664	1
	2,3,7,8-Tetrachlorodibenzofuran	NV	NV	NV	0.0726	1
	Octachlorodibenzo- <i>p</i> -dioxin	NV	NV	NV	0.0990	10
	Octachlorodibenzofuran	NV	NV	NV	0.0782	10
	Total tetrachlorinated dioxins	NV	NV	NV	NA	NA
	Total pentachlorinated dioxins	NV	NV	NV	NA	NA
	Total hexachlorinated dioxins	NV	NV	NV	NA	NA
	Total heptachlorinated dioxins	NV	NV	NV	NA	NA
	Total tetrachlorinated furans	NV	NV	NV	NA	NA
	Total pentachlorinated furans	NV	NV	NV	NA	NA
	Total hexachlorinated furans	NV	NV	NV	NA	NA
	Total heptachlorinated furans	NV	NV	NV	NA	NA
	Dioxins and Furans (2,3,7,8-TCDD TEQ)	1.8E+01	8.5E+02	1.7E+01, 9.5E+02 <sup>d</sup>	NA	NA
Metals (mg/kg)						
	Aluminum	NV	9.9E+05	--	6	10
	Antimony	NV	4.1E+02	--	0.02	0.1
	Arsenic	1.6E+00	2.6E+02	--	0.06	0.5

**Table 2**  
**Chemicals of Interest, Analytical Concentration Goals, and Method Detection/Reporting Limits**

Class	Chemical	USEPA Regional Screening Levels - Industrial Based Soil Screening Level for Human Health <sup>a</sup>		Alternative Screening Level <sup>b</sup>	Method Detection Limit <sup>c</sup>	Method Reporting Limit <sup>c</sup>
		carcinogenic endpoint	non-cancer endpoint			
	Barium	NV	1.9E+05	--	0.30	2
	Cadmium	9.3E+03	8.0E+02	--	0.004	0.02
	Chromium (III) <sup>e</sup>	NV	1.5E+06	--	0.03	0.2
	Cobalt	1.9E+03	3.0E+02	--	0.3	2
	Copper	NV	4.1E+04	--	0.6	2
	Lead	NV	8.0E+02	--	3	20
	Magnesium	NV	NV	NV	0.04	4
	Manganese	NV	2.3E+04	--	0.04	2
	Mercury	NV	3.4E+01	--	0.002	0.02
	Nickel	6.4E+04	2.0E+04	--	0.5	4
	Silver	NV	5.1E+03	--	0.4	2
	Thallium	NV	NV	7.8E+01 <sup>f</sup>	3	20
	Vanadium	NV	7.2E+01	--	0.4	2
	Zinc	NV	3.1E+05	--	0.3	2
<b>PCB Aroclors (µg/kg) <sup>g</sup></b>						
	Aroclor-1016	2.1E+04	3.7E+04	--	2.1	10
	Aroclor-1221	5.4E+02	NV	--	2.1	20
	Aroclor-1232	5.4E+02	NV	--	2.1	10
	Aroclor-1242	7.4E+02	NV	--	2.1	10
	Aroclor-1248	7.4E+02	NV	--	2.1	10
	Aroclor-1254	7.4E+02	1.1E+04	--	2.1	10
	Aroclor-1260	7.4E+02	NV	--	2.1	10
	Aroclor-1262	NV	NV	--	2.1	10
	Aroclor-1268	NV	NV	--	2.1	10
	Total PCBs	NV	NV	2.2E+02 <sup>h</sup>	2.1	20
<b>PCB Congeners, dioxin-like (µg/kg) <sup>g</sup></b>						
	PCB 77	1.1E+02	NV	--	0.085	0.25
	PCB 81	1.1E+02	NV	--	0.09	0.25
	PCB 105	1.1E+02	NV	--	0.055	0.1
	PCB 114	2.3E+00	NV	--	0.06	0.25
	PCB 118	1.1E+02	NV	--	0.095	0.25
	PCB 123	1.1E+02	NV	--	0.075	0.25
	PCB 126	1.1E-01	NV	--	0.07	0.25
	PCB 156	2.3E+01	NV	--	0.065	0.25
	PCB 157	2.3E+01	NV	--	0.065	0.25
	PCB 167	1.1E+03	NV	--	0.055	0.25
	PCB 169	1.1E+00	NV	--	0.08	0.25
	PCB 189	1.1E+02	NV	--	0.09	0.25

**Table 2**  
**Chemicals of Interest, Analytical Concentration Goals, and Method Detection/Reporting Limits**

Class	Chemical	USEPA Regional Screening Levels - Industrial Based Soil Screening Level for Human Health <sup>a</sup>		Alternative Screening Level <sup>b</sup>	Method Detection Limit <sup>c</sup>	Method Reporting Limit <sup>c</sup>
		carcinogenic endpoint	non-cancer endpoint			
PCB Congeners (µg/kg) <sup>g</sup>						
	PCB 1	NV	NV	NV	0.04	0.1
	PCB 2	NV	NV	NV	0.002	0.005
	PCB 3	NV	NV	NV	0.045	0.1
	PCB 4	NV	NV	NV	0.085	0.25
	PCB 5	NV	NV	NV	0.005	0.025
	PCB 6	NV	NV	NV	0.005	0.025
	PCB 7	NV	NV	NV	0.01	0.025
	PCB 8	NV	NV	NV	0.06	0.25
	PCB 9	NV	NV	NV	0.01	0.025
	PCB 10	NV	NV	NV	0.01	0.025
	PCB 11	NV	NV	NV	0.05	0.5
	PCB 12	NV	NV	NV	0.015	0.05
	PCB 13	NV	NV	NV	0.015	0.05
	PCB 14	NV	NV	NV	0.015	0.05
	PCB 15	NV	NV	NV	0.09	0.25
	PCB 16	NV	NV	NV	0.02	0.05
	PCB 17	NV	NV	NV	0.045	0.1
	PCB 18	NV	NV	NV	0.1	0.25
	PCB 19	NV	NV	NV	0.02	0.05
	PCB 20	NV	NV	NV	0.095	0.25
	PCB 21	NV	NV	NV	0.025	0.1
	PCB 22	NV	NV	NV	0.045	0.1
	PCB 23	NV	NV	NV	0.025	0.1
	PCB 24	NV	NV	NV	0.025	0.1
	PCB 25	NV	NV	NV	0.025	0.1
	PCB 26	NV	NV	NV	0.04	0.1
	PCB 27	NV	NV	NV	0.03	0.1
	PCB 28	NV	NV	NV	0.095	0.25
	PCB 29	NV	NV	NV	0.04	0.1
	PCB 30	NV	NV	NV	0.1	0.25
	PCB 31	NV	NV	NV	0.075	0.25
	PCB 32	NV	NV	NV	0.04	0.1
	PCB 33	NV	NV	NV	0.025	0.1
	PCB 34	NV	NV	NV	0.035	0.1

**Table 2**  
**Chemicals of Interest, Analytical Concentration Goals, and Method Detection/Reporting Limits**

Class	Chemical	USEPA Regional Screening Levels - Industrial Based Soil Screening Level for Human Health <sup>a</sup>		Alternative Screening Level <sup>b</sup>	Method Detection Limit <sup>c</sup>	Method Reporting Limit <sup>c</sup>
		carcinogenic endpoint	non-cancer endpoint			
	PCB 35	NV	NV	NV	0.04	0.1
	PCB 36	NV	NV	NV	0.04	0.1
	PCB 37	NV	NV	NV	0.065	0.25
	PCB 38	NV	NV	NV	0.04	0.1
	PCB 39	NV	NV	NV	0.045	0.1
	PCB 40	NV	NV	NV	0.06	0.25
	PCB 41	NV	NV	NV	0.06	0.25
	PCB 42	NV	NV	NV	0.03	0.1
	PCB 43	NV	NV	NV	0.045	0.25
	PCB 44	NV	NV	NV	0.095	0.25
	PCB 45	NV	NV	NV	0.025	0.1
	PCB 46	NV	NV	NV	0.05	0.1
	PCB 47	NV	NV	NV	0.095	0.25
	PCB 48	NV	NV	NV	0.04	0.1
	PCB 49	NV	NV	NV	0.055	0.25
	PCB 50	NV	NV	NV	0.03	0.1
	PCB 51	NV	NV	NV	0.025	0.1
	PCB 52	NV	NV	NV	0.095	0.25
	PCB 53	NV	NV	NV	0.03	0.1
	PCB 54	NV	NV	NV	0.06	0.25
	PCB 55	NV	NV	NV	0.06	0.25
	PCB 56	NV	NV	NV	0.05	0.1
	PCB 57	NV	NV	NV	0.06	0.25
	PCB 58	NV	NV	NV	0.065	0.25
	PCB 59	NV	NV	NV	0.03	0.1
	PCB 60	NV	NV	NV	0.065	0.25
	PCB 61	NV	NV	NV	0.085	0.25
	PCB 62	NV	NV	NV	0.03	0.1
	PCB 63	NV	NV	NV	0.07	0.25
	PCB 64	NV	NV	NV	0.035	0.1
	PCB 65	NV	NV	NV	0.095	0.25
	PCB 66	NV	NV	NV	0.08	0.25
	PCB 67	NV	NV	NV	0.075	0.25
	PCB 68	NV	NV	NV	0.075	0.25
	PCB 69	NV	NV	NV	0.055	0.25

**Table 2**  
**Chemicals of Interest, Analytical Concentration Goals, and Method Detection/Reporting Limits**

Class	Chemical	USEPA Regional Screening Levels - Industrial Based Soil Screening Level for Human Health <sup>a</sup>		Alternative Screening Level <sup>b</sup>	Method Detection Limit <sup>c</sup>	Method Reporting Limit <sup>c</sup>
		carcinogenic endpoint	non-cancer endpoint			
	PCB 70	NV	NV	NV	0.085	0.25
	PCB 71	NV	NV	NV	0.06	0.25
	PCB 72	NV	NV	NV	0.08	0.25
	PCB 73	NV	NV	NV	0.045	0.25
	PCB 74	NV	NV	NV	0.085	0.25
	PCB 75	NV	NV	NV	0.03	0.1
	PCB 76	NV	NV	NV	0.085	0.25
	PCB 78	NV	NV	NV	0.085	0.25
	PCB 79	NV	NV	NV	0.085	0.25
	PCB 80	NV	NV	NV	0.09	0.25
	PCB 82	NV	NV	NV	0.065	0.25
	PCB 83	NV	NV	NV	0.11	0.25
	PCB 84	NV	NV	NV	0.06	0.25
	PCB 85	NV	NV	NV	0.05	0.1
	PCB 86	NV	NV	NV	0.075	0.25
	PCB 87	NV	NV	NV	0.075	0.25
	PCB 88	NV	NV	NV	0.06	0.25
	PCB 89	NV	NV	NV	0.095	0.25
	PCB 90	NV	NV	NV	0.12	0.5
	PCB 91	NV	NV	NV	0.06	0.25
	PCB 92	NV	NV	NV	0.06	0.25
	PCB 93	NV	NV	NV	0.11	0.25
	PCB 94	NV	NV	NV	0.06	0.25
	PCB 95	NV	NV	NV	0.11	0.25
	PCB 96	NV	NV	NV	0.105	0.25
	PCB 97	NV	NV	NV	0.075	0.25
	PCB 98	NV	NV	NV	0.11	0.25
	PCB 99	NV	NV	NV	0.11	0.25
	PCB 100	NV	NV	NV	0.11	0.25
	PCB 101	NV	NV	NV	0.12	0.5
	PCB 102	NV	NV	NV	0.11	0.25
	PCB 103	NV	NV	NV	0.115	0.25
	PCB 104	NV	NV	NV	0.115	0.25
	PCB 106	NV	NV	NV	0.07	0.25
	PCB 107	NV	NV	NV	0.05	0.1

**Table 2**  
**Chemicals of Interest, Analytical Concentration Goals, and Method Detection/Reporting Limits**

Class	Chemical	USEPA Regional Screening Levels - Industrial Based Soil Screening Level for Human Health <sup>a</sup>		Alternative Screening Level <sup>b</sup>	Method Detection Limit <sup>c</sup>	Method Reporting Limit <sup>c</sup>
		carcinogenic endpoint	non-cancer endpoint			
	PCB 108	NV	NV	NV	0.135	0.5
	PCB 109	NV	NV	NV	0.075	0.25
	PCB 110	NV	NV	NV	0.12	0.5
	PCB 111	NV	NV	NV	0.12	0.5
	PCB 112	NV	NV	NV	0.125	0.5
	PCB 113	NV	NV	NV	0.12	0.5
	PCB 115	NV	NV	NV	0.12	0.5
	PCB 116	NV	NV	NV	0.05	0.1
	PCB 117	NV	NV	NV	0.05	0.1
	PCB 119	NV	NV	NV	0.075	0.25
	PCB 120	NV	NV	NV	0.075	0.25
	PCB 121	NV	NV	NV	0.105	0.25
	PCB 122	NV	NV	NV	0.06	0.25
	PCB 124	NV	NV	NV	0.135	0.5
	PCB 125	NV	NV	NV	0.075	0.25
	PCB 127	NV	NV	NV	0.14	0.5
	PCB 128	NV	NV	NV	0.06	0.25
	PCB 129	NV	NV	NV	0.105	0.25
	PCB 130	NV	NV	NV	0.07	0.25
	PCB 131	NV	NV	NV	0.06	0.25
	PCB 132	NV	NV	NV	0.06	0.25
	PCB 133	NV	NV	NV	0.085	0.25
	PCB 134	NV	NV	NV	0.065	0.25
	PCB 135	NV	NV	NV	0.055	0.25
	PCB 136	NV	NV	NV	0.045	0.1
	PCB 137	NV	NV	NV	0.15	0.5
	PCB 138	NV	NV	NV	0.105	0.25
	PCB 139	NV	NV	NV	0.1	0.25
	PCB 140	NV	NV	NV	0.1	0.25
	PCB 141	NV	NV	NV	0.045	0.1
	PCB 142	NV	NV	NV	0.155	0.5
	PCB 143	NV	NV	NV	0.065	0.25
	PCB 144	NV	NV	NV	0.085	0.25
	PCB 145	NV	NV	NV	0.16	0.5
	PCB 146	NV	NV	NV	0.09	0.25



**Table 2**  
**Chemicals of Interest, Analytical Concentration Goals, and Method Detection/Reporting Limits**

Class	Chemical	USEPA Regional Screening Levels - Industrial Based Soil Screening Level for Human Health <sup>a</sup>		Alternative Screening Level <sup>b</sup>	Method Detection Limit <sup>c</sup>	Method Reporting Limit <sup>c</sup>
		carcinogenic endpoint	non-cancer endpoint			
	PCB 147	NV	NV	NV	0.09	0.25
	PCB 148	NV	NV	NV	0.16	0.5
	PCB 149	NV	NV	NV	0.09	0.25
	PCB 150	NV	NV	NV	0.165	0.5
	PCB 151	NV	NV	NV	0.055	0.25
	PCB 152	NV	NV	NV	0.12	0.5
	PCB 153	NV	NV	NV	0.065	0.25
	PCB 154	NV	NV	NV	0.055	0.25
	PCB 155	NV	NV	NV	0.17	0.5
	PCB 158	NV	NV	NV	0.05	0.1
	PCB 159	NV	NV	NV	0.175	0.5
	PCB 160	NV	NV	NV	0.105	0.25
	PCB 161	NV	NV	NV	0.175	0.5
	PCB 162	NV	NV	NV	0.175	0.5
	PCB 163	NV	NV	NV	0.105	0.25
	PCB 164	NV	NV	NV	0.07	0.5
	PCB 165	NV	NV	NV	0.18	0.5
	PCB 166	NV	NV	NV	0.06	0.25
	PCB 168	NV	NV	NV	0.065	0.25
	PCB 170	NV	NV	NV	0.08	0.25
	PCB 171	NV	NV	NV	0.185	0.5
	PCB 172	NV	NV	NV	0.19	0.5
	PCB 173	NV	NV	NV	0.185	0.5
	PCB 174	NV	NV	NV	0.095	0.25
	PCB 175	NV	NV	NV	0.19	0.5
	PCB 176	NV	NV	NV	0.195	0.5
	PCB 177	NV	NV	NV	0.07	0.25
	PCB 178	NV	NV	NV	0.11	0.25
	PCB 179	NV	NV	NV	0.115	0.25
	PCB 180	NV	NV	NV	0.07	0.25
	PCB 181	NV	NV	NV	0.2	0.5
	PCB 182	NV	NV	NV	0.2	0.5
	PCB 183	NV	NV	NV	0.2	0.5
	PCB 184	NV	NV	NV	0.2	0.5
	PCB 185	NV	NV	NV	0.2	0.5

**Table 2**  
**Chemicals of Interest, Analytical Concentration Goals, and Method Detection/Reporting Limits**

Class	Chemical	USEPA Regional Screening Levels - Industrial Based Soil Screening Level for Human Health <sup>a</sup>		Alternative Screening Level <sup>b</sup>	Method Detection Limit <sup>c</sup>	Method Reporting Limit <sup>c</sup>
		carcinogenic endpoint	non-cancer endpoint			
	PCB 186	NV	NV	NV	0.205	0.5
	PCB 187	NV	NV	NV	0.095	0.25
	PCB 188	NV	NV	NV	0.115	0.25
	PCB 190	NV	NV	NV	0.115	0.25
	PCB 191	NV	NV	NV	0.21	0.5
	PCB 192	NV	NV	NV	0.21	0.5
	PCB 193	NV	NV	NV	0.07	0.25
	PCB 194	NV	NV	NV	0.085	0.25
	PCB 195	NV	NV	NV	0.215	0.5
	PCB 196	NV	NV	NV	0.215	0.5
	PCB 197	NV	NV	NV	0.125	0.5
	PCB 198	NV	NV	NV	0.1	0.25
	PCB 199	NV	NV	NV	0.1	0.25
	PCB 200	NV	NV	NV	0.125	0.5
	PCB 201	NV	NV	NV	0.22	0.5
	PCB 202	NV	NV	NV	0.22	0.5
	PCB 203	NV	NV	NV	0.22	0.5
	PCB 204	NV	NV	NV	0.225	0.5
	PCB 205	NV	NV	NV	0.225	0.5
	PCB 206	NV	NV	NV	0.225	0.5
	PCB 207	NV	NV	NV	0.225	0.5
	PCB 208	NV	NV	NV	0.23	0.5
	PCB 209	NV	NV	NV	0.075	0.25
<b>Semivolatile Organic Compounds (SVOCs) (ug/kg)</b>						
	Acenaphthene	NV	3.3E+07	--	1.4	10
	Fluorene	NV	2.2E+07	--	1.1	10
	Naphthalene	1.8E+04	6.2E+05	--	2.3	10
	Phenanthrene	NV	NV	1.9E+07 <sup>f</sup>	1.4	10
	2,4,6-Trichlorophenol	1.6E+05	6.2E+05	--	1.4	10
	2,4-Dichlorophenol	NV	1.8E+06	--	1.0	10
	Pentachlorophenol	9.0E+03	1.2E+07	--	20	100
	Phenol	NV	1.8E+08	--	2.0	30
	Hexachlorobenzene	1.1E+03	4.9E+05	--	1.2	10
	2,3,4,6-Tetrachlorophenol	NV	1.8E+07	--	46	330
	Carbazole	NV	NV	9.5E+05 <sup>f</sup>	1.3	10
	2,4,5-Trichlorophenol	NV	6.2E+07	--	1.5	10

**Table 2**  
**Chemicals of Interest, Analytical Concentration Goals, and Method Detection/Reporting Limits**

Class	Chemical	USEPA Regional Screening Levels - Industrial Based Soil Screening Level for Human Health <sup>a</sup>		Alternative Screening Level <sup>b</sup>	Method Detection Limit <sup>c</sup>	Method Reporting Limit <sup>c</sup>
		carcinogenic endpoint	non-cancer endpoint			
	Bis(2-ethylhexyl)phthalate	1.2E+05	1.2E+07	--	7.0	100
<b>Volatile Organic Compounds (VOCs) (ug/kg)</b>						
	Chloroform	1.5E+03	1.1E+06	--	0.22	20
	1,2,4-Trichlorobenzene	9.9E+04	2.7E+05	--	0.14	20
	1,2-Dichlorobenzene	NV	9.8E+06	--	0.063	5
	1,3-Dichlorobenzene	NV	NV	8.8E+04 <sup>f</sup>	0.07	5
	1,4-Dichlorobenzene	1.2E+04	2.5E+07	--	0.1	5
	1,2,3-Trichlorobenzene	NV	4.9E+05	--	0.048	5

**Notes and Sources:**

-- = Not applicable, USEPA screening level is available.

NV = No value available

Shaded = Shaded value represents the most appropriate screening level for evaluating chronic risks to industrial workers (i.e., in the case that a cancer and non-cancer value is available the final USEPA screening level is based on the lower of the two values. The interim PRGs were selected for dioxins/furans as these reflect more currently accepted science/regulatory levels).

a - USEPA, 2010. Regional Screening Values for Industrial/Commercial Soil. Available at: [http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\\_table/Generic\\_Tables/index.htm](http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/Generic_Tables/index.htm).

b - Alternative values were provided only for select compounds (to reflect current regulatory activity), and analytes for which no USEPA screening level is available.

c - Method detection limits and method reporting limits are on a dry weight basis.

d - USEPA, 2009. Draft Recommended Interim Preliminary Remediation Goals for Dioxin in Soil at CERCLA and RCRA Sites. OSWER. 9200.3-56. December 2009. Available at: [http://www.epa.gov/superfund/policy/remedy/pdfs/Interim\\_Soil\\_Dioxin\\_PRG\\_Guidance\\_12-30-09.pdf](http://www.epa.gov/superfund/policy/remedy/pdfs/Interim_Soil_Dioxin_PRG_Guidance_12-30-09.pdf)

e - The chromium(VI) screening level is lower than the chromium(III) level; however, speciation for chromium will not be performed so the screening value for chromium(VI) was not included as an analytical concentration goal.

f - TCEQ, 2010. TRRP Protective Concentration Levels. Tier 1 Commercial/Industrial PCLs for 30 acre source area. Available at: <http://www.tceq.state.tx.us/remediation/trrp/trrppcls.html>.

Values for thallium, phenanthrene, and 1,3-dichlorobenzene are based on non-cancer endpoints. Value for carbazole is derived from a carcinogenic endpoint.

g - PCB Aroclors will be analyzed in all soils and a volume will be archived for possible PCB congener analyses. PCB congener screening levels, method detection limits, and method reporting limits are presented for use if PCB congener analyses are performed.

h - Alternative value for total PCBs based on the human health risk assessment analytical concentration goal from the San Jacinto Waste Pits Sediment SAP and agreement with TCE

**Table 3**  
**Soil Sampling Design**

Sample Group	Sampling Method and Depth	Number of Locations	Sample Locations	Analytes	Study Elements
Site surface soil, for human health and ecological risk assessment	Stainless steel shovel, trowel, or spoon 0-6 inches (0-15 cm)	3	Area 4a	COIs, TOC, and grain size	Nature and extent, exposure assessment, fate and transport
Site shallow subsurface soil	Stainless steel shovel, hand auger, or hand corer 6-12 inches (15-30 cm)	3	Area 4a	COIs, TOC, and grain size	Nature and extent, exposure assessment
Site soil core	Geoprobe® 0 to native material (14 ft max) surface: 0-6 inches shallow subsurface: 6-12 inches remainder of top 2 feet: 12-24 inches deep subsurface: 2-foot intervals	7	Area 4a	COIs, TOC, and grain size	Nature and extent, exposure assessment; CSM
Site soil core	Geoprobe® 0 to native material (14 ft max) surface: 0-6 inches shallow subsurface: 6-12 inches remainder of top 2 feet: 12-24 inches deep subsurface: 2-foot intervals	3	Area 4a and 4b	PCDD and PCDF, TOC, and grain size	Nature and extent, exposure assessment; CSM

**Notes**

COI = chemical of interest

CSM = conceptual site model

PCDD = polychlorinated dibenzo-*p*-dioxins

PCDF = polychlorinated dibenzofurans

TOC = total organic carbon

**Table 4**  
**Proposed Laboratory Methods for Soil Samples**

Parameter	Laboratory	Sample Preparation		Quantitative Analysis	
		Protocol	Procedure	Protocol	Procedure
Metals					
Antimony	CAS-Kelso	USEPA 3050	Strong acid digestion	USEPA 6020	ICP/MS
Silver	CAS-Kelso	USEPA 3050	Strong acid digestion	USEPA 6010B	ICP
Organics					
PCB Aroclors	CAS-Kelso	USEPA 3541	Automated soxhlet extraction	USEPA 8082	GC/ECD
VOCs	CAS-Kelso	USEPA 5035	Purge and trap	USEPA 8260B	GC/MS

**Notes**

This table lists methods for chemicals not listed in the Soil Sampling and Analysis Plan.

CAS = Columbia Analytical Services

ICP = inductively coupled plasma-atomic emission spectrometry

ICP/MS = inductively coupled plasma/mass spectrometry

GC/ECD = gas chromatography/electron capture detector

GC/MS = gas chromatography/mass spectrometry

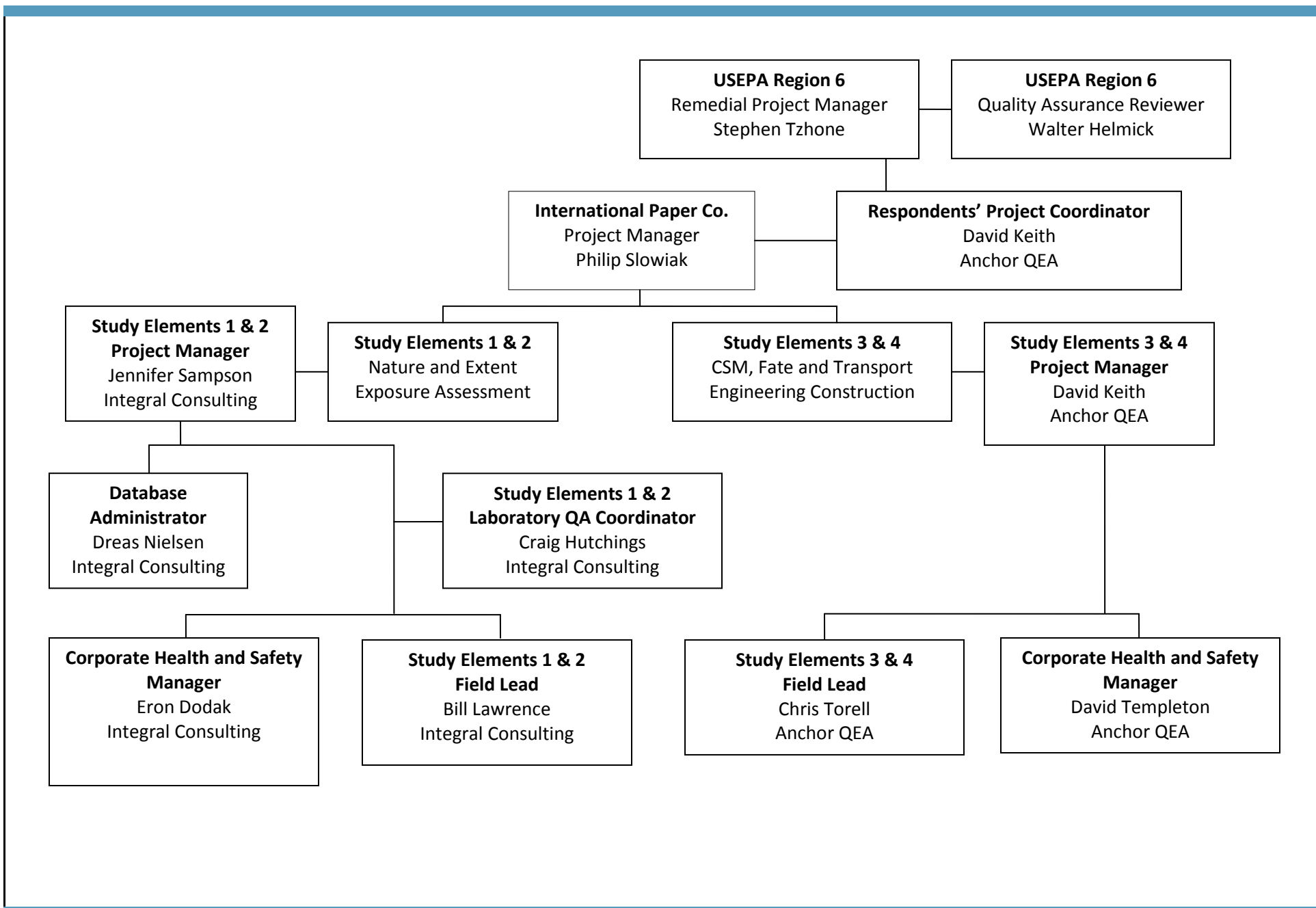
PCB - polychlorinated biphenyl

USEPA = U.S. Environmental Protection Agency

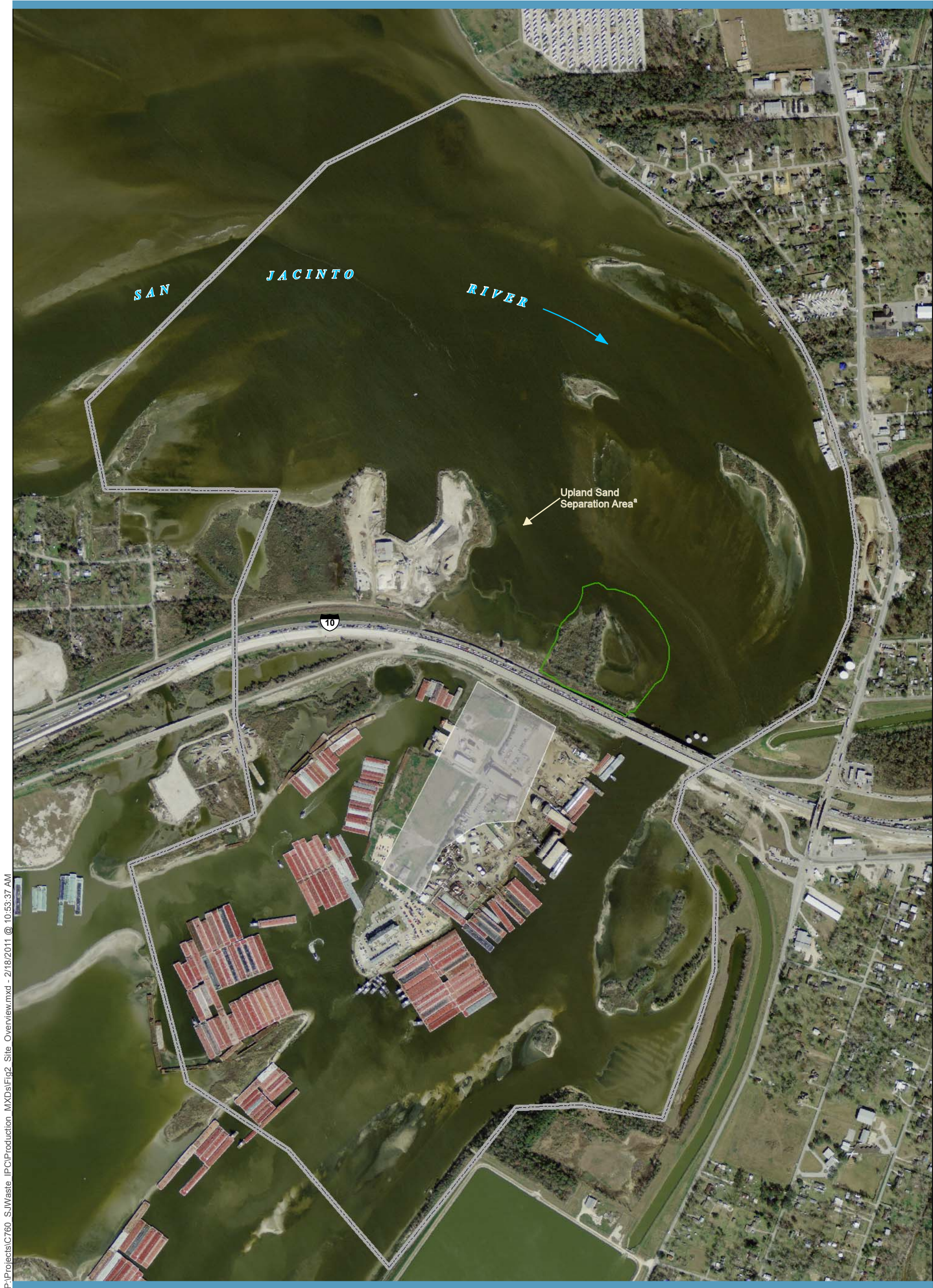
VOC = volatile organic compound

## FIGURES

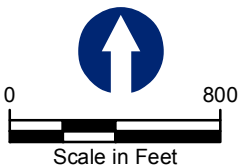
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






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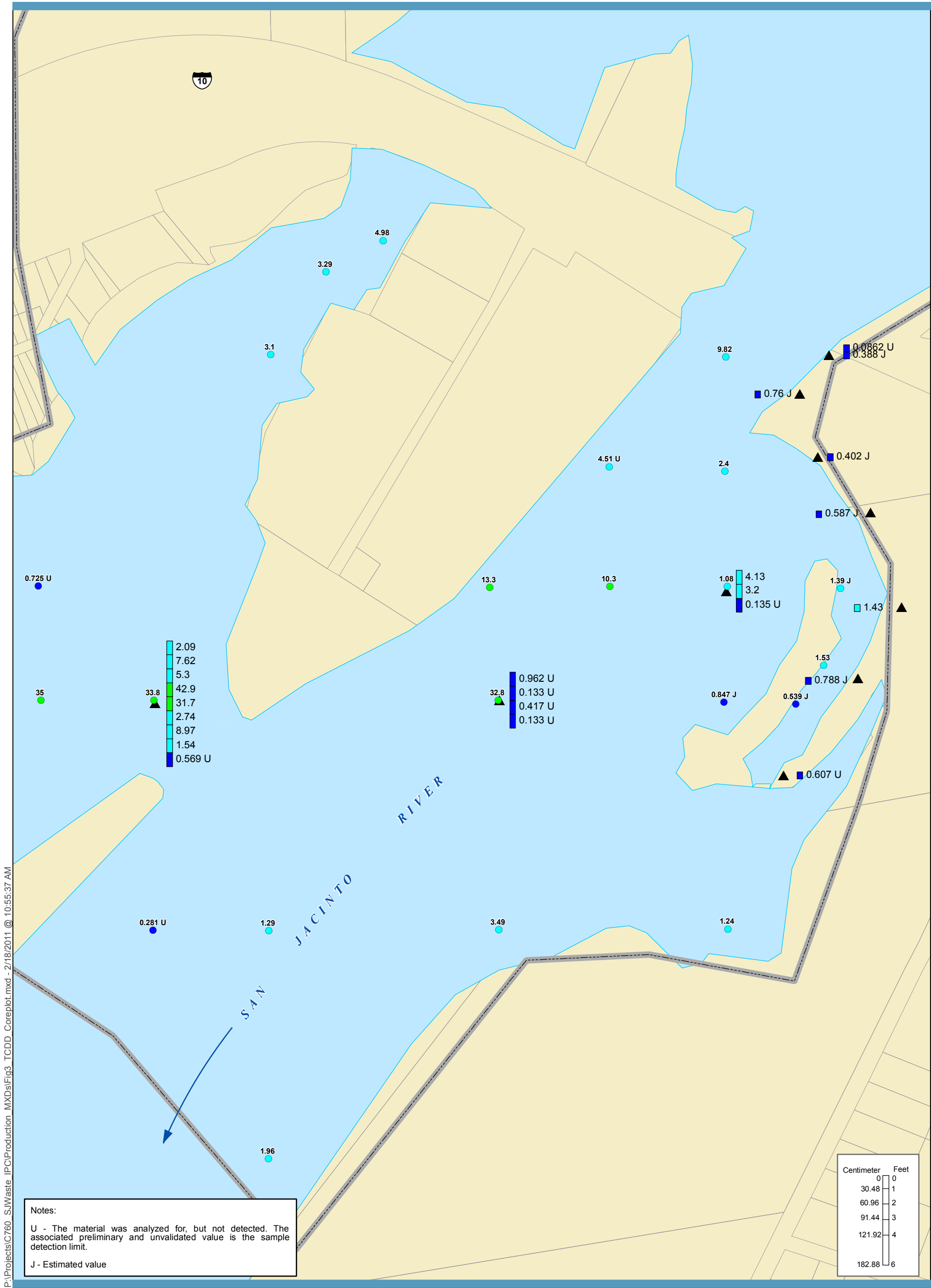
-  USEPA's Preliminary Site Perimeter
-  Original (1966) Perimeter of the Northern Impoundments
-  Area of Soil Investigation South of I-10

\*Designation of the sand separation area is intended to be a general reference to areas in which such activities are believed to have taken place based on visual observations of aerial photography from 1998 through 2002.

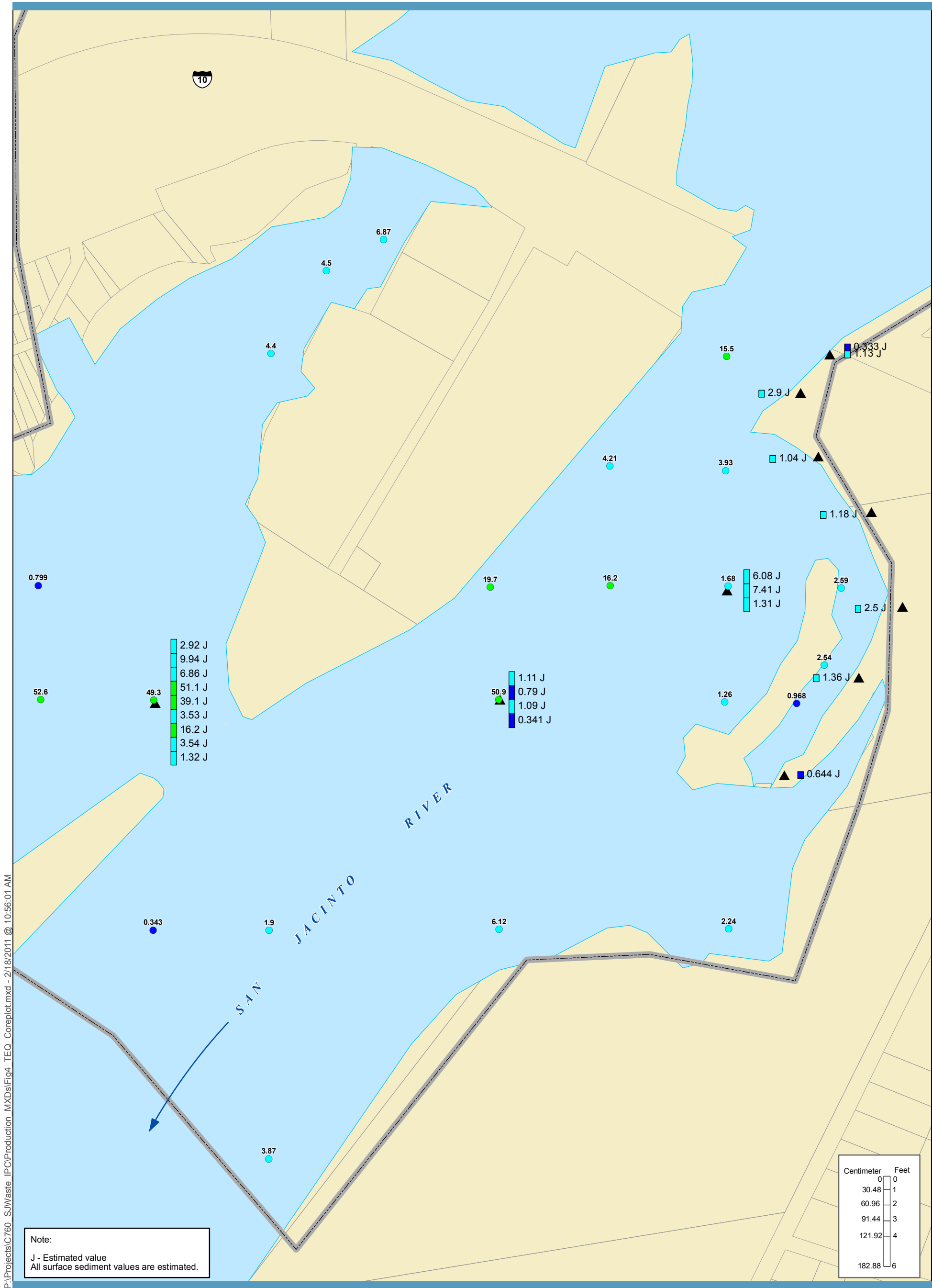
FEATURE SOURCES:  
Aerial Imagery: 0.5-meter, Photo Date: 01/14/2009  
Texas Strategic Mapping Program (StratMap), TNRIS

**Figure 2**  
Overview of Soil Study Area  
SJRWSP Soil SAP Addendum 1  
SJRWSP Superfund/IPC





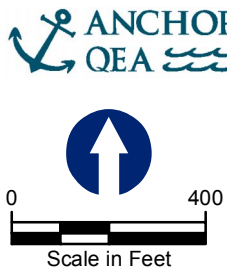
**Figure 3**  
2,3,7,8-TCDD Concentrations (ng/kg dw)  
in 2010 Sediment Samples  
Surrounding the Area South of I-10  
SJRW Superfund/MIMC and IPC



**Figure 4**  
TEQ Concentrations (ng/kg dw)  
in 2010 Sediment Samples  
Surrounding the Area South of I-10  
SJRW Superfund/MIMC and IPC



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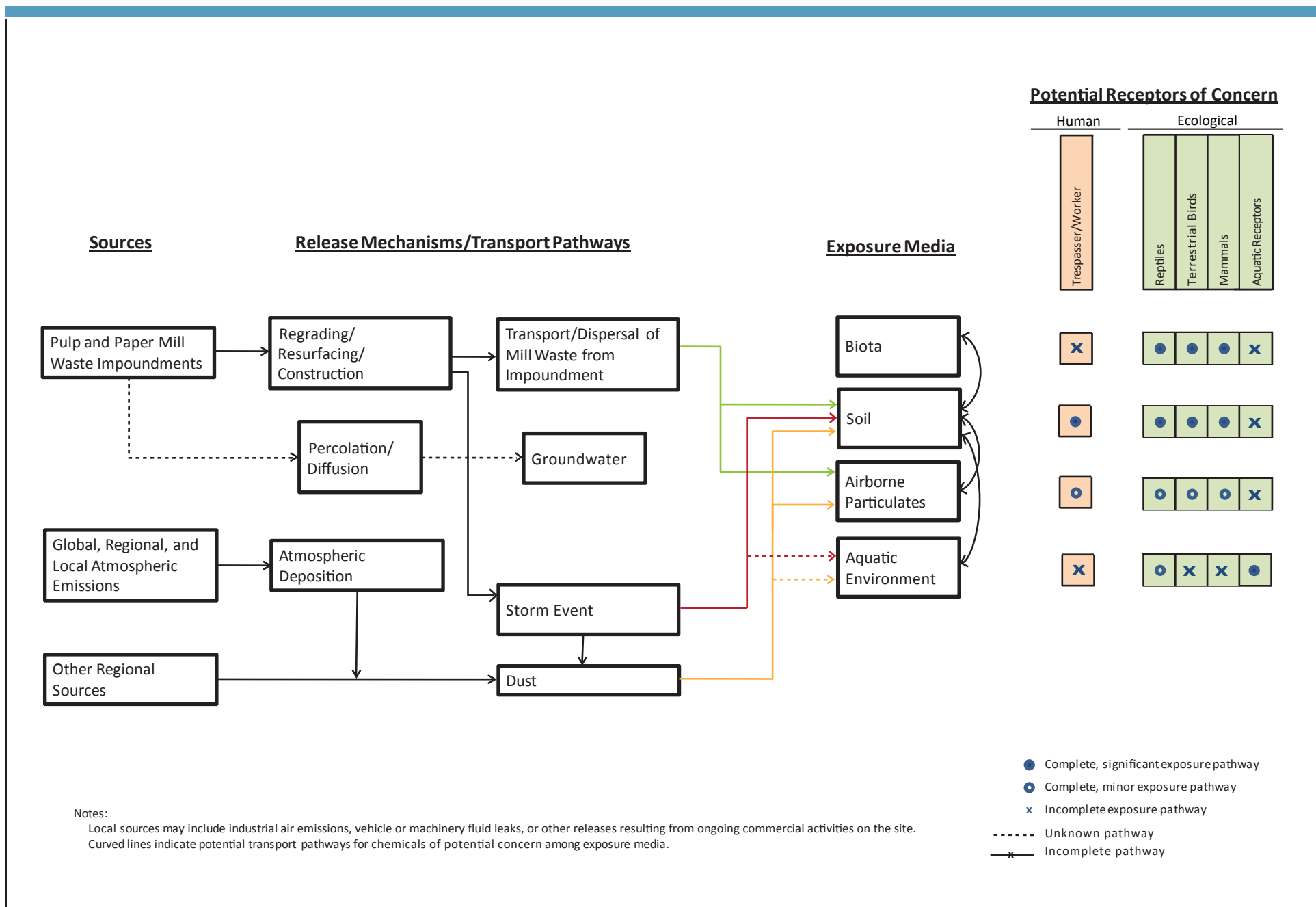


integral  
consulting inc.

- Approximate impoundment boundary derived from historical TSDH drawings.
- Boundary of a flooded area that is visible in a 1966 aerial photograph
- The smaller of two approximate impoundment boundaries proposed by EPA on the basis of a 1964 aerial photograph.
- The larger of two approximate impoundment boundaries proposed by EPA on the basis of historical drawings by the TSDH.
- USEPA's Preliminary Site Perimeter
- Original (1966) Perimeter of the Northern Impoundments

\* Designation of the sand separation area is intended to be a general reference to areas in which such activities are believed to have taken place based on visual observations of aerial photography from 1998 through 2002.  
FEATURE SOURCES: Aerial Photo USGS 1966

**Figure 5**  
Possible Interpretations of the  
South Impoundment Perimeter  
SJRWSP Soil SAP Addendum 1  
SJRWSP Superfund/IPC



		Potential Human Receptors of Concern
<u>Exposure Media</u>	<u>Exposure Route</u>	Trespasser/Worker
Soil	Ingestion	●
	Dermal contact	●
Airborne Particulates	Inhalation	○

Notes:

- Potentially complete and significant exposure pathway
- Potentially complete but minor exposure pathway

		Potential Ecological Receptors of Concern			
Exposure Media	Exposure Routes	Reptiles	Terrestrial Birds	Mammals	Aquatic Receptors
Biota	Ingestion	●	●	●	✕
Soil	Ingestion	●	●	●	✕
	Direct Contact	○	○	○	✕
Airborne Particulates	Inhalation	○	○	○	✕
Aquatic Environment	Ingestion	●	✕	✕	●
	Direct Contact	○	✕	✕	●

Notes:

- Potentially complete and significant exposure pathway
- Potentially complete but minor exposure pathway
- ✕ Incomplete exposure pathway

**Figure 8**  
 Conceptual Site Model for Ecological Exposures  
 SJRWP Soil SAP Addendum 1  
 SJRWP Superfund/IPC





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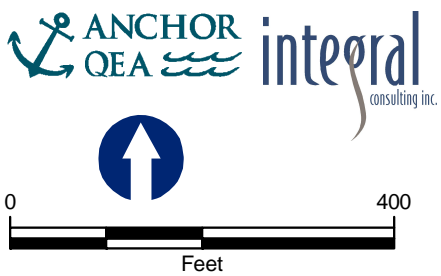
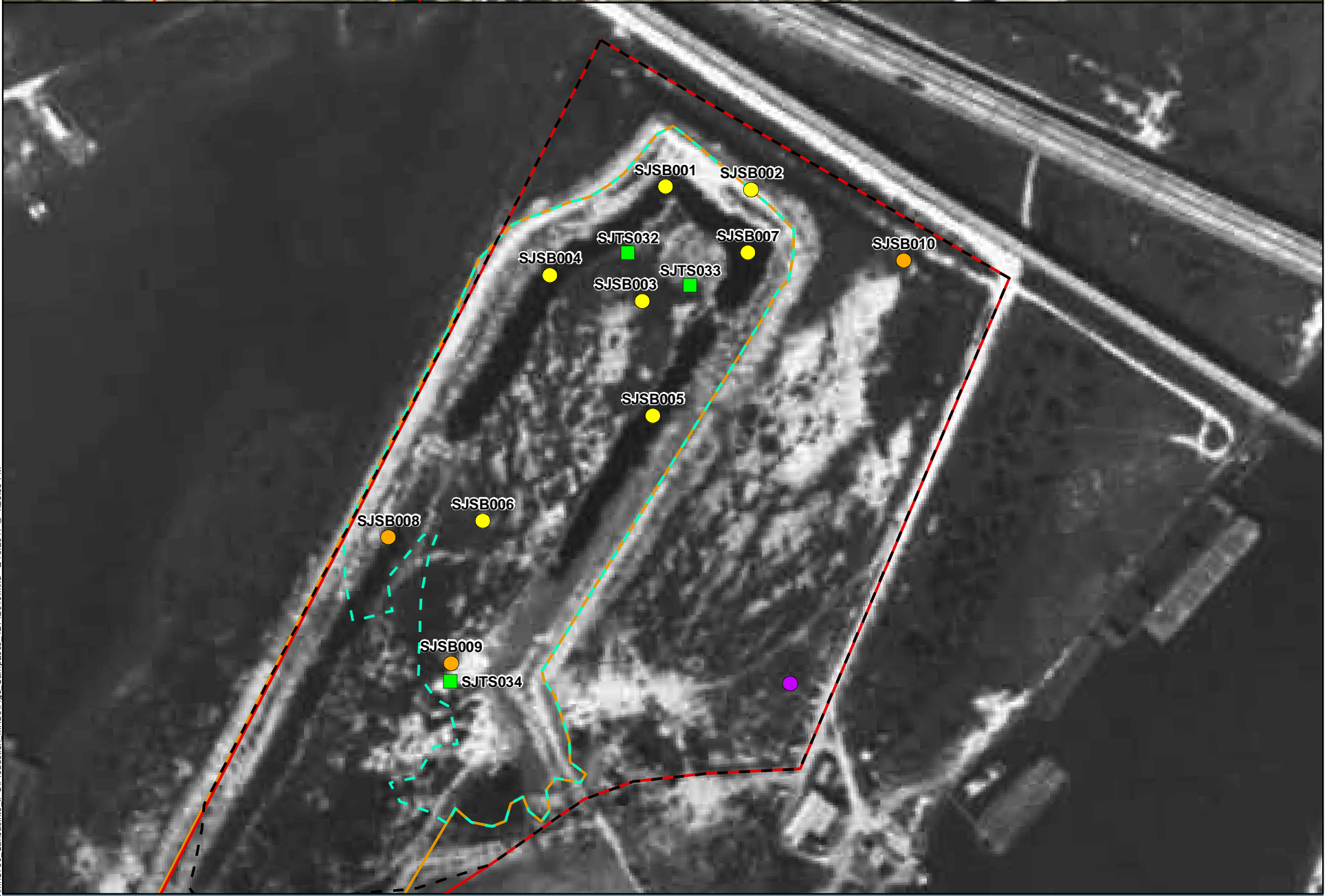
0 400  
Scale in Feet

- Soil Sampling Area 4a
- Soil Sampling Area 4b

FEATURE SOURCES:  
Aerial Imagery: 0.5-meter 2008/2009 DOQQs-  
Texas Strategic Mapping Program (StratMap)

**Figure 9**  
Overview of Area 4 and Subarea Locations  
SJRWSP Soil SAP Addendum 1  
SJRWSP Superfund/IPC

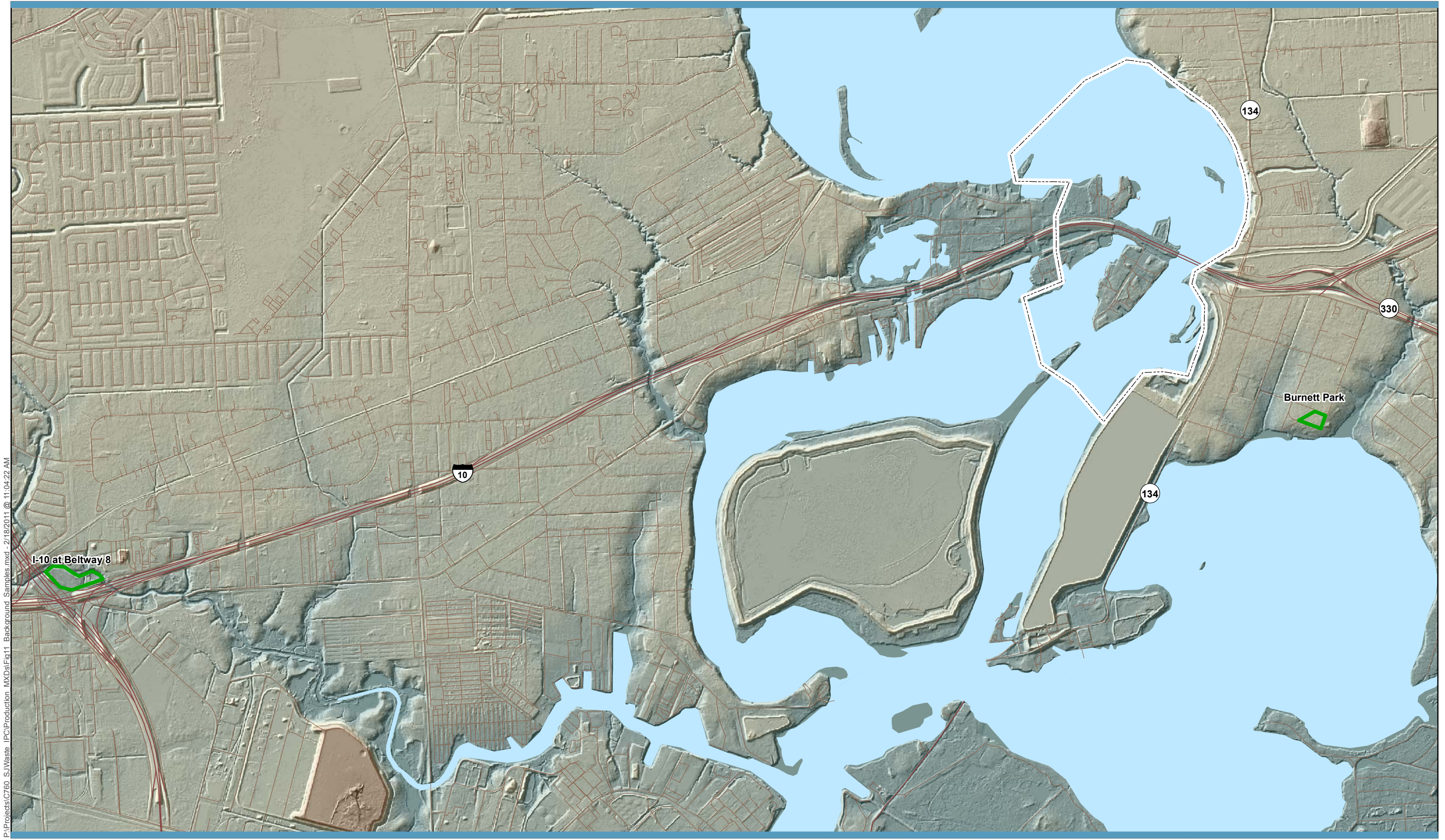




- Soil Core at 2 Ft Intervals (Surface and Shallow Subsurface Sample Intervals: 0-6, 6-12 and 12-24 Inches)
- Soil Core at 2 Ft Intervals, Dioxins and Furans Only
- Potential Future Core Location
- Surface and Shallow Subsurface Sample Stations (0-6 and 6-12 Inches)
- Digitized State Department of Health Hand Drawn Map
- Flooded Area on 1966 Aerial Photograph
- Texas State Department of Health May 1966 Hand-Drawn Map (TSDH 1966)
- USGS 1966 Aerial Photograph South Impoundment Perimeter

**Figure 10**  
Sample Locations for Area 4  
SJRWP Soil SAP Addendum 1  
SJRWP Superfund/IPC

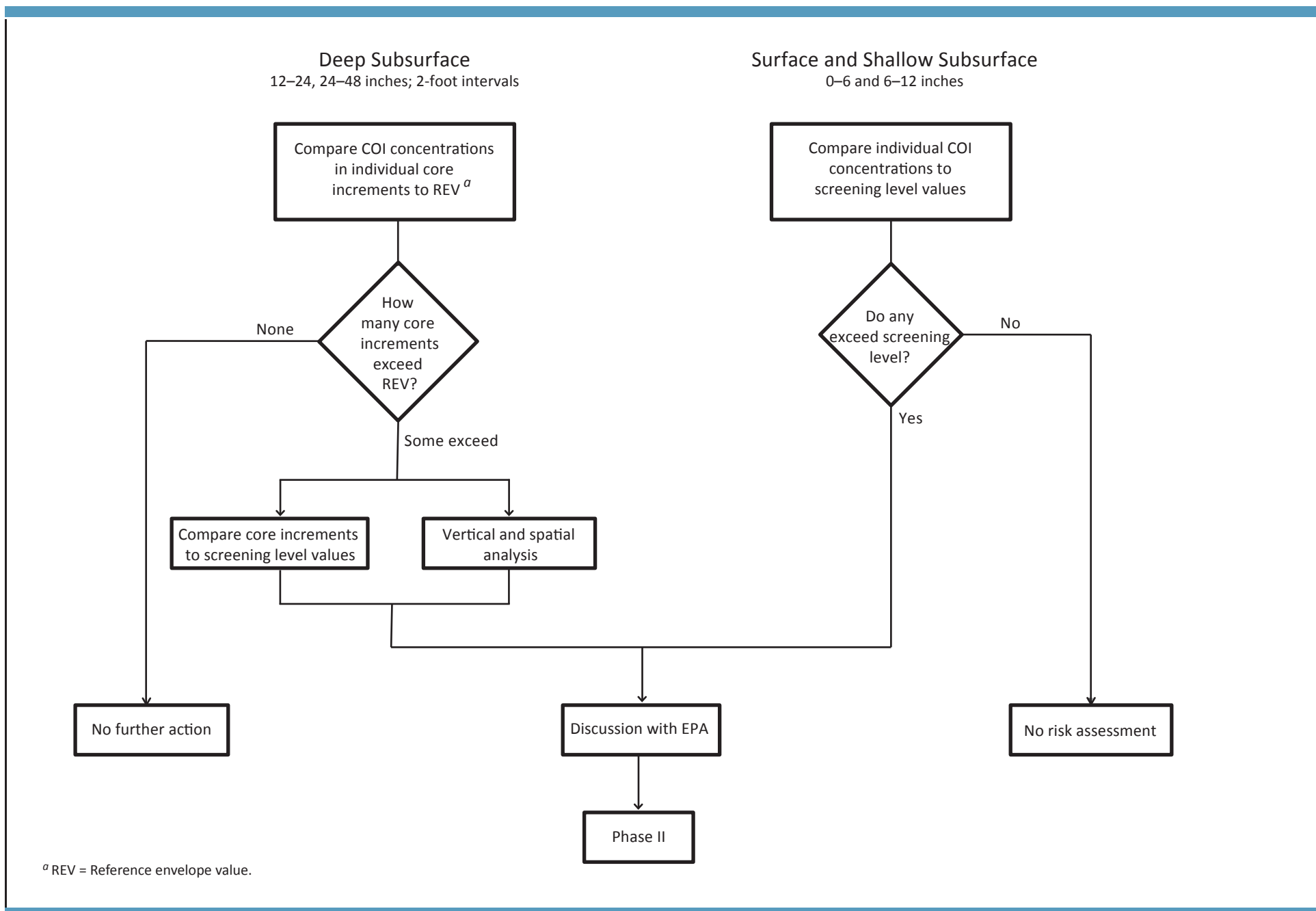




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**Figure 11**  
 Background Soil Sampling Locations  
 SJRWP Soil SAP Addendum 1  
 SJRWP Superfund/MIMC and IPC





APPENDIX A  
SOIL FIELD SAMPLING PLAN,  
ADDENDUM 1  
SAN JACINTO RIVER WASTE PITS  
SUPERFUND SITE

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# SOIL FIELD SAMPLING PLAN, ADDENDUM 1 SAN JACINTO RIVER WASTE PITS SUPERFUND SITE

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## **Prepared for**

International Paper Company

U.S. Environmental Protection Agency, Region 6

## **Prepared by**



Integral Consulting Inc.

411 First Avenue South, Suite 550

Seattle, Washington 98104

**March 2011**

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Attachment A1	Standard Operating Procedures
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Attachment A3	Field Forms
Attachment A4	USEPA Risk Assessment Guidance Forms (per the Unilateral Administrative Order Statement of Work)

## LIST OF ACRONYMS AND ABBREVIATIONS

<b>Abbreviation</b>	<b>Definition</b>
Anchor QEA	Anchor QEA, LLC
ASTM	American Society for Testing and Materials
bgs	below ground surface
COI	chemical of interest
DGPS	differential global positioning system
FSP	Field Sampling Plan
GPS	global positioning system
HASP	Health and Safety Plan
I-10	Interstate Highway 10
Integral	Integral Consulting Inc.
IPC	International Paper Company
MIMC	McGinnes Industrial Maintenance Corporation
PCB	polychlorinated biphenyl
QA	quality assurance
QA/QC	quality assurance and quality control
QC	quality control
RI/FS	Remedial Investigation and Feasibility Study
SAP	Sampling and Analysis Plan
Site	San Jacinto River Waste Pits Superfund Site
SJRWP	San Jacinto River Waste Pits
SOP	Standard Operating Procedure
TOC	total organic carbon
UAO	Unilateral Administrative Order
USEPA	U.S. Environmental Protection Agency

## 1 INTRODUCTION

This Field Sampling Plan (FSP) Addendum has been prepared on behalf of International Paper Company (IPC), pursuant to the requirements of Unilateral Administrative Order (UAO), Docket No. 06-03-10, which was issued by the U.S. Environmental Protection Agency (USEPA) to IPC and McGinnes Industrial Maintenance Corporation (MIMC) on November 20, 2009 (USEPA 2009). The 2009 UAO directs IPC and MIMC to conduct a Remedial Investigation and Feasibility Study (RI/FS) for the San Jacinto River Waste Pits (SJRWP) Superfund Site in Harris County, Texas (the Site). Additional information on the Site history and a summary of existing data are provided in the Soil Sampling and Analysis Plan Addendum (Soil SAP Addendum 1).

The Site consists of impoundments, built in the mid-1960s for disposal of paper mill wastes, and the surrounding areas containing sediments and soils potentially contaminated with the waste materials that had been disposed of in these impoundments. Two impoundments, together approximately 14 acres in size, are located on a 20-acre parcel immediately north of the I-10 Bridge and on the western bank of the San Jacinto River, in Harris County, Texas (Figure A-1). USEPA has identified an area south of I-10 to be investigated, based on historical documents and aerial photographs indicating that an additional impoundment was constructed south of I-10, on the peninsula of land directly south of the 20 acre parcel. This area was used as a disposal area in the mid-1960s for paper mill waste from the same mill as that disposed of in the two impoundments immediately north of I-10 (Figure A-1). A discussion of the history of this area south of I-10 is presented in the Soil SAP Addendum 1.

This document supplements information in the main Soil FSP (Appendix A of Integral 2010) and specifically addresses sampling within Area 4 of the Site. Field personnel conducting the work described in this addendum should have both this document, and Appendix A of the Soil SAP (Integral 2010) in hand when performing sampling. Surface (0 to 6 inches), shallow subsurface (6 to 12 inches) and deep subsurface samples (cores at 2 foot increments) will be collected south of I-10. Because the sampling at surface soil stations will be conducted in the same manner as for sampling in Areas 1 through 3 to the north of I-10, surface and shallow subsurface sampling methods and procedures can be found in the main FSP. This Addendum



focuses on the execution of the sampling elements unique to Area 4, specifically the 10 soil cores designed to address the nature and extent investigation south of I-10.

## 1.1 Overview

The soil sampling design for the RI/FS incorporates a number of different components (as discussed in the Soil SAP and Soil SAP Addendum 1). The individual study components for the investigation south of I-10 differ in the locations and depths at which soil is to be collected. Soil samples addressed in this document will be collected from the following areas (Figure A-2):

- **Area 4a.** The area in which paper mill waste handling south of I-10 is most likely to have affected soil.
- **Area 4b.** The area in which paper mill waste handling south of I-10 may have occurred and could have affected soil.

All surface and shallow subsurface soil samples, and all samples from the seven northernmost cores in Area 4a will be analyzed for all chemicals of interest (COIs; metals, polychlorinated biphenyls [PCBs] as Aroclors, volatile organic compounds, semivolatile organic compounds, and dioxins and furans), grain size, and total organic carbon (TOC). All intervals from the remaining three cores (two at the southern end of Area 4a and one in Area 4b) will be analyzed for dioxins and furans, TOC, and grain size. At all locations, and for all intervals, an archival sample will be collected for each sample for possible future analysis of PCB congeners. In the three cores to be analyzed for dioxins and furans only, sufficient sample volume will be archived for analysis of all remaining COIs at each interval, if necessary.

Investigation of the area south of I-10 may include two phases. This document addresses only activities to be performed in Phase I. The sampling design can be summarized as follows:

- **Area 4a:** Surface and shallow subsurface soil sampling and analysis of COIs at three locations from the area south of I-10 (stations SJTS032 through SJTS034; Figure A-2 and Table A-1). Surface and subsurface soil samples will be collected at all of these stations at depths of 0 to 6 inches (0 to 15 cm) and 6 to 12 inches (15 to 30 cm). In

addition, 10 soil borings (stations SJSB001 through SJSB010; Figure A-2 and Table A-1) will be collected. The analytical requirements for soil samples collected from Area 4a are as follows:

- *Surface Soil Stations:* The surface and subsurface soil samples collected from depths of 0 to 6 inches (0 to 15 cm) and 6 to 12 inches (15 to 30 cm) from the three stations in Area 4a (Figure A-2) will be analyzed for COIs, TOC, and grain size. An additional soil sample in a unique jar will be collected from each of these sample intervals for possible future analyses of PCB congeners.
- *Soil Cores 2-foot intervals:* Deep subsurface soils will be sampled as soil cores with 2-foot intervals, at nine locations in Area 4a and one location in Area 4b. In the seven northernmost cores, the first interval will be separated into three surface intervals: 0 to 6 inches, 6 to 12 inches (0 to 15 and 15 to 30 cm), and 12 to 24 inches (30 to 60 cm). All of these samples will be analyzed for COIs, TOC, and grain size. An additional soil jar will be collected from these sample intervals and archived for possible future analyses of PCB congeners. At the two southernmost core stations in Area 4a and the one core station in Area 4b, samples will also be collected at 2-foot intervals, but the top 2 feet will not be subdivided, and only dioxins, furans, TOC, and grain size will be analyzed. Sufficient material will be collected from each interval for possible future analysis of all COIs, if necessary. If the coring device disrupts the process of collecting the top three intervals in cores where the upper 2 feet is subdivided (e.g., inadvertently mixing the top two or three intervals), a sample of just these top intervals will be collected adjacent to the core using the methods described in the main Soil FSP (Integral 2010). Cores will be advanced to a depth at which there is a clear distinction between intervals on the basis of grain size, lithology or other indicators (e.g., plant fragments) suggesting the presence of native materials, and an absence of human disturbance, or to 14 feet, whichever is less. Finally, an increment of 5 feet will be collected at the deepest depth (within native materials) for analysis.

If a groundwater study is determined to be necessary during Phase II, surface and subsurface soil samples will be collected during drilling of groundwater wells. Field methods and procedures are described in the Groundwater SAP. If additional soil sampling is required for a Phase II investigation, an additional SAP Addendum will be developed.

## 1.2 Document Organization

This FSP Addendum describes the field methods that will be used to collect soil cores from Areas 4a and 4b of the Site in the 2011 soil study addressing nature and extent and exposure assessment. The background, rationale, data quality objectives, and overall study design are described in detail in the Soil SAP (Integral 2010) and Soil SAP Addendum 1. All of the elements (sample handling, field documentation, etc.) presented in the main FSP (Integral 2010) are applicable to this FSP Addendum 1 and are not repeated in this document. This FSP addendum focuses on the methods and field procedures that will be used to collect soil cores. The following documents are provided as additional attachments to the main FSP to support the sampling presented in this FSP Addendum 1:

- Attachment A1: Standard Operating Procedures. The only SOP unique to this FSP Addendum is SOP SL-07, Subsurface Soil Sampling. SL-07 describes the procedures that will be used to execute and collect soil cores. Other SOPs are found in Attachment A2 of the main Soil FSP (Appendix A to Integral 2010), address all other aspects of this field program, and must be used by field personnel.
- Attachment A2: Addendum 4 to the Overall Health and Safety Plan: Soil Sampling Health and Safety Plan. This document describes the specific requirements and procedures that will be implemented to minimize the safety risk to personnel who carry out the field study program for soil core sampling to be conducted south of I-10. It is an addendum to and references the project's overall health and safety plan (HASP; Anchor QEA 2009), and the HASP Addendum in the main Soil FSP (Appendix A, Attachment A1 to Integral 2010).
- Attachment A3. Field Forms. The only field form unique to sampling south of I-10 is the boring log, which is included as Attachment A3.
- Attachment A4: Exhibit 5 and Exhibit 52 summarizing the study design and analytes, respectively, as required by the UAO.

## **2 SAMPLING PROCEDURES**

The following sections describe the detailed procedures and methods that will be used during the soil study in Area 4, including sampling procedures, recordkeeping, sample handling, storage, and field quality control (QC) procedures, to the extent that they differ from the main FSP (Appendix A of Integral 2010). Sample collection and processing will be conducted in accordance with the SOPs provided in Attachment A2 of the main FSP (Integral 2010) and Attachment A1 of this FSP Addendum. Field forms are provided in Attachment A3 of the main Soil FSP, and in Attachment A3 of this document. Depending on field conditions, procedures specified in the referenced SOPs may be modified if necessary. Any deviations from approved FSPs will be documented in a field sampling report. All field activities will be conducted in accordance with the soil HASP addendum that is provided as Attachment A1 of the FSP (Integral 2010) and Attachment A2 of this FSP Addendum.

### **2.1 Field Survey and Sampling Methods**

The following sections present the soil sampling methodology.

#### **2.1.1 Field Equipment and Supplies**

Field equipment and supplies include sampling equipment, utensils, decontamination supplies, sample containers, coolers, shipping containers, log books and forms, personal protection equipment, and personal gear. Protective wear (e.g., nitrile gloves) is required to minimize the possibility of cross-contamination between sampling locations. Additional information on protective wear required for this project is provided in Attachment A1 of the FSP (Integral 2010) and Attachment A2 of this FSP Addendum.

Surface soil samples (0 to 6 inches; 0 to 15 cm), and shallow subsurface samples (6 to 12 inches; 15 to 30 cm) will be collected from three locations and at each of the seven northernmost core locations in Area 4a using decontaminated stainless-steel shovels, trowels, or spoons (as described in the main FSP). A coring device (e.g., hand-held corers, hand auger, or equivalent type of equipment) or stainless steel shovel may be used for shallow subsurface soil sample collection (6 to 12 inches [15 to 30 cm]); and the uppermost deep subsurface sample (12 to 24 inches [30 to 60 cm]).

There are nine soil cores targeted for sampling in Area 4a and one in Area 4b. Sampling activities will be conducted under the direction of an Integral or Anchor QEA representative, in accordance with the applicable sections of the SOPs (Attachment A1 of this FSP Addendum). Coring services will be provided by a contractor, which will be determined after the final approval of this FSP Addendum. A Geoprobe® will be used to collect deep subsurface soil samples. Continuous soil samples will be collected to a depth at which soil conditions indicate the presence of undisturbed native materials, or to a maximum depth of 14 feet below ground surface [bgs], whichever is reached first, with an additional 5-foot increment below that deepest point. It is anticipated that the water table may be encountered within 10 to 12 feet bgs. If the water table is not encountered within 11 feet bgs, coring will be continued until the water table is encountered and a sample at least 1-foot thick beneath the water table can be collected. However, cores will be collected no deeper than 19 feet bgs. Based on sediment cores from the impoundments north of I-10 and the elevation data for Area 4, we anticipate that the Beaumont Formation clay (refusal) occurs approximately at 20 to 40 feet bgs.

Sample jars, preservatives, laboratory-grade distilled water, coolers, and packaging material for the samples will be supplied by the analytical laboratory. Details on the types of sample containers are provided in the Soil SAP Addendum 1 and in Table A-2 of this FSP Addendum. The field lead and field personnel in charge of sample handling in the field will use a sample matrix table (Table A-3) as a QC check to ensure that all samples have been collected at a given station and to record sample and tag numbers. This table includes the total number and type of sample jars required for each analysis at each sampling station. Commercially available, pre-cleaned jars will be used for the samples, and the testing laboratories will maintain a record of certification from the suppliers. The bottle shipment documentation will include batch numbers. With this documentation, jars can be traced to the supplier, and bottle-wash analysis results can be reviewed. The bottle-wash certificate documentation will be archived in Integral's project file.

Sample containers will be clearly labeled at the time of sampling. Labels will include the task name, sample number, sampler's initials, analyses to be performed, and sample date and time. Sample numbering and identification procedures are described in more detail in

Section 3.5 of the main FSP (Integral 2010) and in SOP AP-04, in Attachment A2 of the main Soil FSP.

### **2.1.2      *Sample Location Positioning***

Sample location positioning procedures are presented in Section 2.1.2 of the main Soil FSP (Integral 2010); the relevant SOP (SOP AP-06) is included in Attachment A2 of the same document. Proposed soil sampling location coordinates for Area 4 are provided in Table A-4.

### **2.1.3      *Surface and Shallow Subsurface Soil Sample Collection***

The equipment and procedures that will be used to collect surface and shallow subsurface soil samples during the 2010 soil study are discussed in the main Soil FSP, Section 2.1.3 (Integral 2010) and in SOP SL-06. The estimated numbers of field locations that will be sampled are listed in Table A-1. The holding time requirements for the soil samples following field collection are specified in Table A-2. Soil samples will be collected in accordance with the sample matrix table (Table A-3).

Surface soil samples (0 to 6 inches; 0 to 15 cm) and shallow subsurface samples (6 to 12 inch; 15 to 30 cm) may be collected with a variety of sampling equipment depending upon the conditions encountered in the field, including stainless-steel shovels, trowels, and spoons. The process for collecting surface soil samples is described in Section 2.1.3 of the main Soil FSP; the process for collecting shallow subsurface samples (6 to 12 inches; 15 to 30 cm) and the uppermost deep subsurface samples (12 to 24 inches; 30 to 60 cm) is described in Section 2.1.4 of the main Soil FSP. The boring log for recording observations when collecting surface, shallow subsurface, and the uppermost interval of the deep subsurface is provided in the main FSP, Attachment A3.

All soil samples will be analyzed for COIs, TOC, and grain size, except for samples from two cores in the southern extent of Area 4a and one core in Area 4b, which will be analyzed for dioxins and furans only, TOC, and grain size. Additional soil from each sample will be archived for possible future analyses (required volume for each archive is specified in Table A-3).

Procedures for containing, labeling, storage and shipping are also described in the main Soil FSP.

#### **2.1.4 Soil Core Collection**

Soil cores will be collected using either a Geoprobe™ or a truck-mounted AMS power probe™ or a similar sampling device. A minimum internal diameter of 3 inches (7.6 cm) will be used for all core liners to ensure adequate soil mass for all the intended analyses. New, high density polyethylene, acetate, or similar type material will be used for the core liners. All drilling activities will be overseen by a geologist.

Soil probes will be hydraulically pushed in 4-foot intervals to the target depth, at a controlled rate to minimize agitation of the core (refer to SOP SL-07; Attachment A1). Collocated surface, shallow subsurface, and the uppermost deep subsurface samples will also be collected at each core location by separating or separately collecting those intervals (Section 2.1.3). Subsequent samples will be collected from 2-foot intervals. The cores will be observed and logged using the Unified Soil Classification System.

A core catcher will be inserted into the bottom end of the corer to prevent the core from slipping out when the corer is raised. After the core has been retrieved and secured, the liner that contains the sample will be removed from the corer barrel, the ends will be capped and the core will be inspected. Boreholes will be abandoned by backfilling in accordance with Texas regulations.

The surface interval of soil cores may occasionally become overly compacted or damaged by the boring process. In such cases, samples corresponding to the surface intervals (0 to 6, 6 to 12, and 12 to 24 inches) may be collected from a location within 2 feet of the boring using the same methods and procedures as for the surface and shallow subsurface samples, as described above in Sections 2.1.3. A record of this substitution will be made in the boring log.

After the core is judged to be acceptable, end caps will be labeled with the station identifier, core section, and soil orientation. The core liner will then be placed on clean polyethylene

sheeting, laid out horizontally and cut lengthwise, and the core will be split open. Cores will be inspected for predominant physical characteristics, photographs will be taken of the undisturbed soil, and soil characteristics will be described on a boring log (see Appendix A, Attachment A3).

The soil from each respective core section will be placed in a decontaminated stainless-steel or Teflon® bowl and homogenized to achieve a uniform texture and color using a decontaminated stainless-steel or Teflon® spoon. The homogenized sample from each section will be subsampled and transferred to pre-cleaned sample containers with Teflon®-lined lids (Table A-3). Soil touching the sides of the core tube will be excluded from each subsample, as will large rocks, cobbles, and vegetative matter. Immediately after sample containers are filled, they will be placed in a cooler on ice. Samples will be stored in accordance with storage requirements for each set of analytes as detailed in Table A-2. Any remaining soil mass will be used for the archive sample. Quality control samples will be collected as described in Section 2.2 below.

### **2.1.5      *Equipment Decontamination***

Decontamination procedures are addressed in Section 2.1.5 of the FSP (Integral 2010).

## **2.2      *Field Quality Control Samples***

Field QC samples will be used to assess sample variability and evaluate potential sources of contamination. The types of QC samples that will be collected for the 2010 soil study in Area 4 are described in this section. Detailed information on quality assurance and quality control (QA/QC) procedures, limits, and reporting are described in detail in the SAP (Integral 2010). The estimated numbers of field QC samples to be collected are listed in the sample matrix table (Table A-3). If QC problems are encountered, they will be brought to the attention of Integral's laboratory QA coordinator. Corrective actions, if appropriate, will be implemented to meet the task's data quality indicators.

Field QC samples will include field split samples, standard reference materials, equipment filter wipe blanks, and filter blanks. The Field QC samples will be collected in accordance



with SOP SL-02 (Appendix A, Attachment A2 of Integral 2010). The following QC samples will be collected in the field and analyzed by the analytical laboratory for Area 4:

- Field split samples will be collected and analyzed to assess the variability associated with sample processing and laboratory variability. Blind field split samples will be collected at a minimum frequency of 1 field split sample per 20 soil samples. A total of 5 field split samples will be collected during the soil study (Table A-3) in Area 4. Samples will be assigned unique numbers and will not be identified as field splits to the laboratory. Field split samples will be collected from two surface, two shallow subsurface and three soil boring soil samples for chemical analysis. A minimum of one field split sample will be collected for each kind of sample collected.
- Standard reference materials are samples of known concentration that have typically undergone multilaboratory analyses using a standard method. Reference materials provide a measure of analytical performance and/or analytical method bias. One standard reference material for soil will be submitted from the field and analyzed for dioxins and furans.
- Equipment filter wipe blanks will be collected to help identify possible contamination from the sampling environment or from the sampling equipment (e.g., stainless-steel shovel, coring device, spoons, and mixing bowls). Equipment filter wipe blanks will be generated at approximately 5 percent of the soil sampling stations at a minimum, with at least one filter wipe blank collected for each type of sampling equipment. A total of 4 equipment filter wipe blanks will be collected during the soil study in Area 4 (Table A-3). One equipment filter wipe will be prepared for each analysis type. If multiple analyses are requested, separate sets of filter wipes will be collected for each analysis type for each kind of sampling equipment used, as the equipment can be wiped down only once for each piece of filter paper. This ensures that the filter wipe result represents the most conservative estimate of cross contamination for each analysis type. (Note: Filter papers must be stored in their original box, wrapped carefully in three layers of aluminum foil, or contained in a glass jar. The filter paper box cannot be stored in plastic bags or containers.) All equipment wipe samples will be clearly noted in the field log (e.g., sample identifier, equipment type, date and time of collection, analysis, and filter lot number).
- Filter blanks are prepared in the field to evaluate potential background concentrations present in filter paper used for the equipment filter wipe blank. Filter blanks will be

collected at a minimum frequency of one for each lot number of filter papers used for collecting the equipment wipe blanks.

### **2.3 Sample Packaging and Transport**

Sample packaging and transport are addressed in Section 2.3 of the FSP (Integral 2010) and in SOP AP-01, in Attachment A2 of the main Soil FSP.

### **2.4 Study-Derived Wastes**

Waste disposal is addressed in Section 2.4 of the FSP (Integral 2010).

### 3 FIELD DOCUMENTATION

The integrity of each sample from the time of collection to the point of data reporting must be maintained. Proper record-keeping and chain-of-custody procedures will allow samples to be traced from collection to final disposition. Representative photographs will be taken of each area where samples are collected. A photograph will be taken of each surface and shallow subsurface soil sample and each soil boring interval collected. Site photos from various angles and close-up views of the overall conditions will also be taken as necessary. Field documentation procedures will follow guidelines provided in SOP AP-02 (Appendix A, Attachment A2 of Integral 2010). Field forms are provided in Attachment A3 of this document, and of the main Soil FSP.

#### 3.1 Field Log Book

All field activities and observations will be noted in a log book, as described in Section 3.1 of the FSP (Integral 2010).

#### 3.2 Boring Logs

The field geologist will provide soil descriptions and characterize all soil core samples in accordance with SOPs SL-04 and SL-06 (Appendix A, Attachment A2 of Integral 2010) and ATSM guidelines (ASTM 2000) for the soils on a standard boring log (Attachment A2).<sup>1</sup> Boring logs will include the following information:

- Soil descriptions
- Date and time of collection of each soil sample
- Names of field personnel collecting and handling the samples
- Type of sampling equipment used (e.g., stainless steel, hand-corer, Geoprobe®)
- Sample station identification
- Sample number
- Length and depth intervals of each core section and estimated recovery (if applicable)

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<sup>1</sup> Boring log forms for surface and shallow subsurface samples are provided in the main Soil FSP, Attachment A3.

### **3.3 Chain-of-Custody Procedures**

Sampling in Area 6 will follow the same chain-of-custody procedures as outlined in Section 3.3 of the FSP (Integral 2010), and in SOP AP-03 of Attachment A2 to the main FSP.

### **3.4 Station Numbering**

All stations will be assigned a unique identification code based on a designation scheme designed to suit the needs of the field personnel, data management, and data users. Soil sampling station numbers will include “SJ” to indicate San Jacinto followed by a two-letter code for the type of sample to be collected at a given location (TS = top soil; SB = soil boring). The letters will be followed by a three-digit number (e.g., 032, 035). The station numbers will increase as the stations move to the west and south. An example station number for a surface soil station in the 2011 soil study within Area 4 would be SJTS033.

Station numbers will not be recorded on sample labels or chain-of-custody forms to prevent analytical laboratories from seeing the relationships between samples and stations.

### **3.5 Sample Identifiers**

Sampling in Area 4 will follow the same rules for the creation of individual sample identifiers, as described in Section 3.5 of the FSP (Integral 2010). Sample identification codes for deep subsurface samples collected between 24 inches and the bottom of the core will be created as follows: the station number (e.g., SJSB001), followed by a sample depth interval (e.g., 2 to 4 feet, 8 to 10 feet, etc). Example identifiers for a soil core station would be SJSB001-2-4, SJSB001-8-10, with additional intervals added as needed.

#### **4 FIELD DATA MANAGEMENT AND REPORTING PROCEDURES**

Data management and reporting procedures are discussed in Section 4 of the FSP (Integral 2010).

## 5 REFERENCES

- Anchor QEA, 2009. Health and Safety Plan San Jacinto River Waste Pits Superfund Site. Prepared for McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency, Region 6. Anchor QEA, Ocean Springs, MS.
- ASTM, 2000. Standard practice for description and identification of soils (Visual-Manual Procedure). Designation: D2488-00. American Society for Testing and Materials, West Conshohocken, PA.
- Integral, 2010. Sampling and Analysis Plan: Soil Study, San Jacinto Waste Pits Superfund Site. Prepared for McGinnes Industrial Maintenance Corporation, International Paper Company, and U.S. Environmental Protection Agency, Region 6. Integral Consulting Inc., Seattle, WA.
- USEPA, 2009. Unilateral Administrative Order for Remedial Investigation/Feasibility Study. U.S. EPA Region 6 CERCLA Docket No. 06-03-10. In the matter of: San Jacinto River Waste Pits Superfund Site Pasadena, Texas. International Paper Company, Inc. & McGinnes Industrial Management Corporation, respondents.

## TABLES

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**Table A-1**  
**Number of Locations Sampled in Area 4**

Sample Group	Sampling Method and Depth	Number of Locations	Sample Locations	Analytes	Study Elements
Site surface soil, for human health and ecological risk assessment	Stainless steel shovel, trowel, or spoon 0-6 inches (0-15 cm)	3	Area 4a	COIs, TOC, and grain size	Nature and extent, exposure assessment, fate and transport
Site shallow subsurface soil	Stainless steel shovel, hand auger, or hand corer 6-12 inches (15-30 cm)	3	Area 4a	COIs, TOC, and grain size	Nature and extent, exposure assessment
Site soil core	Geoprobe® 0 to native material (14 ft max) surface: 0-6 inches shallow subsurface: 6-12 inches remainder of top 2 feet: 12-24 inches deep subsurface: 2-foot intervals	7	Area 4a	COIs, TOC, and grain size	Nature and extent, exposure assessment; CSM
Site soil core	Geoprobe® 0 to native material (14 ft max) surface: 0-6 inches shallow subsurface: 6-12 inches remainder of top 2 feet: 12-24 inches deep subsurface: 2-foot intervals	3	Area 4a and 4b	PCDD and PCDF, TOC, and grain size	Nature and extent, exposure assessment; CSM

**Notes**

COI = chemical of interest

CSM = conceptual site model

PCDD = polychlorinated dibenzo-*p*-dioxin

PCDF = polychlorinated dibenzofuran

TOC = total organic carbon



**Table A-2**  
**Sample Containers, Preservation, and Holding Time Requirements**

Matrix	Container <sup>a</sup>		Laboratory	Parameter	Preservation	Holding Time	Sample Size <sup>b</sup>
	Type	Size					
Soil							
	WMG	8 oz.	CAS - Kelso	TOC	4±2 °C	28 days	1 g
	WMG	8 oz.	CAS - Kelso	Metals	4±2 °C	6 months	10 g
	WMG	8 oz.	CAS - Kelso	Mercury	4±2 °C	28 days	5 g
	WMG	16 oz.	CAS - Kelso	Grain size	4±2 °C	6 months	100 g
	WMG	8 oz.	CAS - Houston	Dioxins/furans	4±2 °C/Deep frozen (-20 °C) <sup>c</sup> / -10 °C <sup>d</sup>	1 year/1 year <sup>e</sup>	50 g
	WMG	8 oz.	CAS - Houston	PCBs	4±2 °C/Deep frozen (-20 °C) <sup>c</sup> / -10 °C <sup>d</sup>	1 year/1 year <sup>e</sup>	50 g
	WMG	8 oz.	CAS - Kelso	SVOCs	4±2 °C/ Deep frozen (-20 °C) <sup>c</sup>	1 year <sup>f</sup>	50 g
	WMG / with septa	4 oz.	CAS - Kelso	VOCs	4±2 °C	14 days	5 g
	WMG	16 oz.	TBD	Archival	4±2 °C/ Deep frozen (-20 °C) <sup>c</sup>	TBD	100 g
Equipment Filter Wipe Blanks							
	WMG	4 oz.	CAS - Kelso	Metals	4±2 °C	6 months	1 wipe
	WMG	4 oz.	CAS - Kelso	Mercury	4±2 °C	28 days	1 wipe
	WMG	4 oz.	CAS - Houston	Dioxins/furans	4±2 °C	1 year/1 year <sup>e</sup>	1 wipe
	WMG	4 oz.	CAS - Houston	PCBs	4±2 °C	1 year/1 year <sup>e</sup>	1 wipe
	WMG	4 oz.	CAS - Kelso	SVOCs	4±2 °C	14 days/40 days <sup>e</sup>	1 wipe

**Notes**

PCB = polychlorinated biphenyl  
SVOC = semivolatile organic compound  
TOC = total organic carbon  
VOC = volatile organic compound  
WMG = wide mouth glass

a - The size and number of containers may be modified by the analytical laboratory.

b - Sample sizes may be modified once laboratory selection is made.

c - Samples will be shipped to the laboratory on ice at 4±2 °C. Once received at the laboratory, samples will be stored at -20 °C.

d - Extracts will be stored at -10 °C.

e - Holding time for samples prior to extraction/ holding time for extracts.

f - Holding time for frozen samples is 1 year.

Table A-3  
Field Sample Collection Matrix for Area 4

Station Number	Sample Identifier	Sample Number	Sample Depth	Sample Type	Soil Sample Analyses						Blank Filter Wipes				
					Primary					Archival	Ghost Wipes		Whatman Grade 42 Filter Papers		
					TOC, Metals (including mercury)	Grain Size	SVOCs, PCB Aroclors	VOCs	Dioxins and Furans	TBD	Metals	Mercury	Dioxins and Furans	PCB Aroclors	SVOCs
					8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>
					4±2 °C	4±2 °C	4±2 °C	4±2 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2°C	4±2 °C	4±2 °C	4±2 °C	4±2 °C
Soil Sample Area 4 Surface and Shallow Subsurface Soils															
<div>☐</div> <div>SJTS032</div>	SJTS032-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJTS032-A-DUP	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Field Split	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJTS032-B	SL _ _ _ _ _	6 - 12 inches (15 -30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
<div>☐</div> <div>SJTS033</div>	SJTS033-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJTS033-B	SL _ _ _ _ _	6 - 12 inches (15 -30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
<div>☐</div> <div>SJTS034</div>	SJTS034-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJTS034-B	SL _ _ _ _ _	6 - 12 inches (15 -30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJTS034-B-DUP	SL _ _ _ _ _	6 - 12 inches (15 -30 cm)	Field Split	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
<div>☐</div> <div>FW Blank</div>	SSFW-921S	FW _ _ _ _ _	Surface Sampling Equipment	Equipment filter wipe blank <sup>d</sup>	NA	NA	NA	NA	NA	NA	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____
<div>☐</div> <div>FW Blank</div>	SSFW-922C	FW _ _ _ _ _	Subsurface Sampling Equipment	Equipment filter wipe blank <sup>d</sup>	NA	NA	NA	NA	NA	NA	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____
<div>☐</div> <div>Filter Paper</div>	SSFB-923	FB _ _ _ _ _	Filter paper	Filter blank <sup>e</sup>	NA	NA	NA	NA	NA	NA	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____
Soil Sample Area 4 Soil Cores															
	SJSB001-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB001-B	SL _ _ _ _ _	6 - 12 inches (15 - 30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB001-C	SL _ _ _ _ _	12 - 24 inches (30 - 60 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB001-C-DUP	SL _ _ _ _ _	12 - 24 inches (30 - 60 cm)	Field Split	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB001-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA

Table A-3  
Field Sample Collection Matrix for Area 4

Station Number	Sample Identifier	Sample Number	Sample Depth	Sample Type	Soil Sample Analyses						Blank Filter Wipes				
					Primary					Archival	Ghost Wipes		Whatman Grade 42 Filter Papers		
					TOC, Metals (including mercury)	Grain Size	SVOCs, PCB Aroclors	VOCs	Dioxins and Furans	TBD	Metals	Mercury	Dioxins and Furans	PCB Aroclors	SVOCs
					8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>
					4±2 °C	4±2 °C	4±2 °C	4±2 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2°C	4±2 °C	4±2 °C	4±2 °C	4±2 °C
☐ SJSB001	SJSB001-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB001-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB001-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB001-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB001-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB001-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
☐ SJSB002	SJSB002-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB002-B	SL _ _ _ _ _	6 - 12 inches (15 - 30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB002-C	SL _ _ _ _ _	12 - 24 inches (30 - 60 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB002-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB002-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB002-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB002-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB002-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB002-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB002-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
☐ FW Blank	SBFW-924C	FW _ _ _ _ _	Subsurface Sampling Equipment	Equipment filter wipe blank <sup>d</sup>	NA	NA	NA	NA	NA	NA	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____
	SJSB003-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB003-B	SL _ _ _ _ _	6 - 12 inches (15 - 30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA

Table A-3  
Field Sample Collection Matrix for Area 4

Station Number	Sample Identifier	Sample Number	Sample Depth	Sample Type	Soil Sample Analyses						Blank Filter Wipes				
					Primary					Archival	Ghost Wipes		Whatman Grade 42 Filter Papers		
					TOC, Metals (including mercury)	Grain Size	SVOCs, PCB Aroclors	VOCs	Dioxins and Furans	TBD	Metals	Mercury	Dioxins and Furans	PCB Aroclors	SVOCs
					8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>
					4±2 °C	4±2 °C	4±2 °C	4±2 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2°C	4±2 °C	4±2 °C	4±2 °C	4±2 °C
☐ SJSB003	SJSB003-C	SL _ _ _ _ _	12 - 24 inches (30 - 60 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB003-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB003-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB003-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB003-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB003-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB003-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB003-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
☐ FW Blank	SBFW-925C	FW _ _ _ _ _	Subsurface Sampling Equipment	Equipment filter wipe blank <sup>d</sup>	NA	NA	NA	NA	NA	NA	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____
☐ SJSB004	SJSB004-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB004-B	SL _ _ _ _ _	6 - 12 inches (15 - 30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB004-B-DUP	SL _ _ _ _ _	6 - 12 inches (15 - 30 cm)	Field Split	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB004-C	SL _ _ _ _ _	12 - 24 inches (30 - 60 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB004-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB004-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB004-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB004-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB004-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB004-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA

Table A-3  
Field Sample Collection Matrix for Area 4

Station Number	Sample Identifier	Sample Number	Sample Depth	Sample Type	Soil Sample Analyses						Blank Filter Wipes				
					Primary					Archival	Ghost Wipes		Whatman Grade 42 Filter Papers		
					TOC, Metals (including mercury)	Grain Size	SVOCs, PCB Aroclors	VOCs	Dioxins and Furans	TBD	Metals	Mercury	Dioxins and Furans	PCB Aroclors	SVOCs
					8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>
					4±2 °C	4±2 °C	4±2 °C	4±2 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2°C	4±2 °C	4±2 °C	4±2 °C	4±2 °C
	SJSB004-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
<div><input type="checkbox"/></div> SJSB005	SJSB005-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-B	SL _ _ _ _ _	6 - 12 inches (15 - 30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-C	SL _ _ _ _ _	12 - 24 inches (30 - 60 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-2-4-DUP	SL _ _ _ _ _	2 - 4 feet	Field Split	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB005-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
<div><input type="checkbox"/></div> FW Blank	SBFW-926C	FW _ _ _ _ _	Subsurface Sampling Equipment	Equipment filter wipe blank <sup>d</sup>	NA	NA	NA	NA	NA	NA	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____
<div><input type="checkbox"/></div> SJSB006	SJSB006-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB006-B	SL _ _ _ _ _	6 - 12 inches (15 - 30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB006-C	SL _ _ _ _ _	12 - 24 inches (30 - 60 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB006-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB006-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB006-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA

Table A-3  
Field Sample Collection Matrix for Area 4

Station Number	Sample Identifier	Sample Number	Sample Depth	Sample Type	Soil Sample Analyses						Blank Filter Wipes				
					Primary					Archival	Ghost Wipes		Whatman Grade 42 Filter Papers		
					TOC, Metals (including mercury)	Grain Size	SVOCs, PCB Aroclors	VOCs	Dioxins and Furans	TBD	Metals	Mercury	Dioxins and Furans	PCB Aroclors	SVOCs
					8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>
					4±2 °C	4±2 °C	4±2 °C	4±2 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2°C	4±2 °C	4±2 °C	4±2 °C	4±2 °C
	SJSB006-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB006-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB006-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB006-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
☐ SJSB007	SJSB007-A	SL _ _ _ _ _	0 - 6 inches (0-15 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB007-B	SL _ _ _ _ _	6 - 12 inches (15 - 30 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB007-C	SL _ _ _ _ _	12 - 24 inches (30 - 60 cm)	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB007-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB007-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB007-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB007-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB007-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB007-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB007-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
☐ FW Blank	SBFW-927C	FW _ _ _ _ _	Subsurface Sampling Equipment	Equipment filter wipe blank <sup>d</sup>	NA	NA	NA	NA	NA	NA	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____
	SJSB008-0-2	SL _ _ _ _ _	0 - 2 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB008-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB008-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB008-4-6-DUP	SL _ _ _ _ _	4 - 6 feet	Field Split	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA

Table A-3  
Field Sample Collection Matrix for Area 4

Station Number	Sample Identifier	Sample Number	Sample Depth	Sample Type	Soil Sample Analyses						Blank Filter Wipes				
					Primary					Archival	Ghost Wipes		Whatman Grade 42 Filter Papers		
					TOC, Metals (including mercury)	Grain Size	SVOCs, PCB Aroclors	VOCs	Dioxins and Furans	TBD	Metals	Mercury	Dioxins and Furans	PCB Aroclors	SVOCs
					8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>
					4±2 °C	4±2 °C	4±2 °C	4±2 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2°C	4±2 °C	4±2 °C	4±2 °C	4±2 °C
☐ SJSB008	SJSB008-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB008-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB008-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB008-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB008-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
☐ SJSB009	SJSB009-0-2	SL _ _ _ _ _	0 - 2 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB009-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB009-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB009-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB009-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB009-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB009-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB009-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
☐ SJSB010	SJSB010-0-2	SL _ _ _ _ _	0 - 2 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB010-2-4	SL _ _ _ _ _	2 - 4 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB010-4-6	SL _ _ _ _ _	4 - 6 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB010-6-8	SL _ _ _ _ _	6 - 8 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB010-6-8-DUP	SL _ _ _ _ _	6 - 8 feet	Field Split	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB010-8-10	SL _ _ _ _ _	8 - 10 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA

Table A-3  
Field Sample Collection Matrix for Area 4

Station Number	Sample Identifier	Sample Number	Sample Depth	Sample Type	Soil Sample Analyses						Blank Filter Wipes				
					Primary					Archival	Ghost Wipes		Whatman Grade 42 Filter Papers		
					TOC, Metals (including mercury)	Grain Size	SVOCs, PCB Aroclors	VOCs	Dioxins and Furans	TBD	Metals	Mercury	Dioxins and Furans	PCB Aroclors	SVOCs
					8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	8 oz WMG <sup>a</sup>	16 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>	4 oz WMG <sup>a</sup>
					4±2 °C	4±2 °C	4±2 °C	4±2 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2 °C/ Deep frozen (-20°C) <sup>b</sup> /-10 °C	4±2°C	4±2 °C	4±2 °C	4±2 °C	4±2 °C
	SJSB010-10-12	SL _ _ _ _ _	10 - 12 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB010-12-14	SL _ _ _ _ _	12 - 14 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
	SJSB010-14-19 <sup>f</sup>	SL _ _ _ _ _	14 - 19 feet	Normal	Tag #_____ <sup>g</sup>	Tag #_____	NA	NA	Tag #_____	Tag #_____	NA	NA	NA	NA	NA
<div><input type="checkbox"/></div> FW Blank	SBFW-928C	FW _ _ _ _ _	Subsurface Sampling Equipment	Equipment filter wipe blank <sup>d</sup>	NA	NA	NA	NA	NA	NA	Tag #_____	Tag #_____	Tag #_____	Tag #_____	Tag #_____

**Notes**  
NA = not applicable  
PCB = polychlorinated biphenyl  
SVOC = semivolatile organic compound  
WMG = wide mouth glass

a - The size and number of containers may be modified by the analytical laboratory.  
b - A unique numeric sample tag number will be attached to each sample container. If the amount of material (i.e., everything associated with a single sample number) is too large for a single container, each container will have the same sample number and a different sample label with a unique sample tag number. A sample will also be split between containers if a different preservation technique is used for each container (e.g., freezing archive sample). The sample tag number will appear on the COC forms. Tag numbers are used by laboratories only to confirm that they have received all of the containers that were filled and shipped. Date will be reported by sample number.  
c - Blind field split samples will be collected at a minimum frequency of 1 field split sample per 20 sediment samples.  
d - A filter wipe blank sample will be collected at a minimum frequency of 1 per 20 soil samples. One equipment wipe will be prepared for each analysis type. Because multiple analyses types are requested for this study, separate tests of filter wipes will be collected for each analysis type for each kind of sampling equipment used, as the equipment can be wiped down only once with each piece of filter paper. This ensures that the filter wipe result represents the most conservative estimate of cross contamination for each analysis type.  
e - Filter blanks are prepared in the field to evaluate potential background concentration present in filter paper used for the equipment filter wipe blank. Filter blanks will be collected at a minimum frequency of one for each lot number of filter papers used for collecting the equipment wipe blank. The filter lot number will be clearly noted in the field logbook.  
f - native material.  
g - TOC only; no metals analyses.



**Table A-4**  
**Station Coordinates, Sample Type, Sampling Interval, and Corresponding Analysis for Area 4**

Station Number	Sample Type	Sampling Intervals	Analysis	Coordinates <sup>a</sup>	
				X	Y
SJTS032	Surface and Shallow Subsurface Sampling Location	0-6 in., 6-12 in.	COIs, TOC, grain size	3216110.6953	13856934.6938
SJTS033	Surface and Shallow Subsurface Sampling Location	0-6 in., 6-12 in.	COIs, TOC, grain size	3216204.6550	13856885.3651
SJTS034	Surface and Shallow Subsurface Sampling Location	0-6 in., 6-12 in.	COIs, TOC, grain size	3215841.5016	13856285.0228
SJSB001	Core with 2 ft Interval; Surface Intervals 0-6; 6-12; 12-24 inches	0-6; 6-12; 12-24 inches; 24-in intervals up to 14 feet ; final interval 5 feet native material	COIs, TOC, grain size	3216167.0711	13857035.7005
SJSB002	Core with 2 ft Interval; Surface Intervals 0-6; 6-12; 12-24 inches	0-6; 6-12; 12-24 inches; 24-in intervals up to 14 feet ; final interval 5 feet native material	COIs, TOC, grain size	3216297.0896	13857030.8688
SJSB003	Core with 2 ft Interval; Surface Intervals 0-6; 6-12; 12-24 inches	0-6; 6-12; 12-24 inches; 24-in intervals up to 14 feet ; final interval 5 feet native material	COIs, TOC, grain size	3216131.8363	13856861.8750
SJSB004	Core with 2 ft Interval; Surface Intervals 0-6; 6-12; 12-24 inches	0-6; 6-12; 12-24 inches; 24-in intervals up to 14 feet ; final interval 5 feet native material	COIs, TOC, grain size	3215991.8743	13856901.6079
SJSB005	Core with 2 ft Interval; Surface Intervals 0-6; 6-12; 12-24 inches	0-6; 6-12; 12-24 inches; 24-in intervals up to 14 feet ; final interval 5 feet native material	COIs, TOC, grain size	3216148.2792	13856688.0496
SJSB006	Core with 2 ft Interval; Surface Intervals 0-6; 6-12; 12-24 inches	0-6; 6-12; 12-24 inches; 24-in intervals up to 14 feet ; final interval 5 feet native material	COIs, TOC, grain size	3215890.5159	13856529.4121
SJSB007	Core with 2 ft Interval; Surface Intervals 0-6; 6-12; 12-24 inches	0-6; 6-12; 12-24 inches; 24-in intervals up to 14 feet ; final interval 5 feet native material	COIs, TOC, grain size	3216292.1047	13856935.3381
SJSB008	Core with 2 ft Intervals	24-in intervals up to 14 feet ; final interval 5 feet native material	PCDD and PCDF, TOC, grain size	3215747.0067	13856504.0775
SJSB009	Core with 2 ft Intervals	24-in intervals up to 14 feet ; final interval 5 feet native material	PCDD and PCDF, TOC, grain size	3215842.2007	13856313.4713

**Table A-4**  
**Station Coordinates, Sample Type, Sampling Interval, and Corresponding Analysis for Area 4**

Station Number	Sample Type	Sampling Intervals	Analysis	Coordinates <sup>a</sup>	
				X	Y
SJSB010	Core with 2 ft Intervals	24-in intervals up to 14 feet ; final interval 5 feet native material	PCDD and PCDF, TOC, grain size	3216528.1829	13856923.3749

**Notes**

COI = chemical of interest

PCDD = polychlorinated dibenzo-*p* -dioxin

PCDF = polychlorinated dibenzofuran

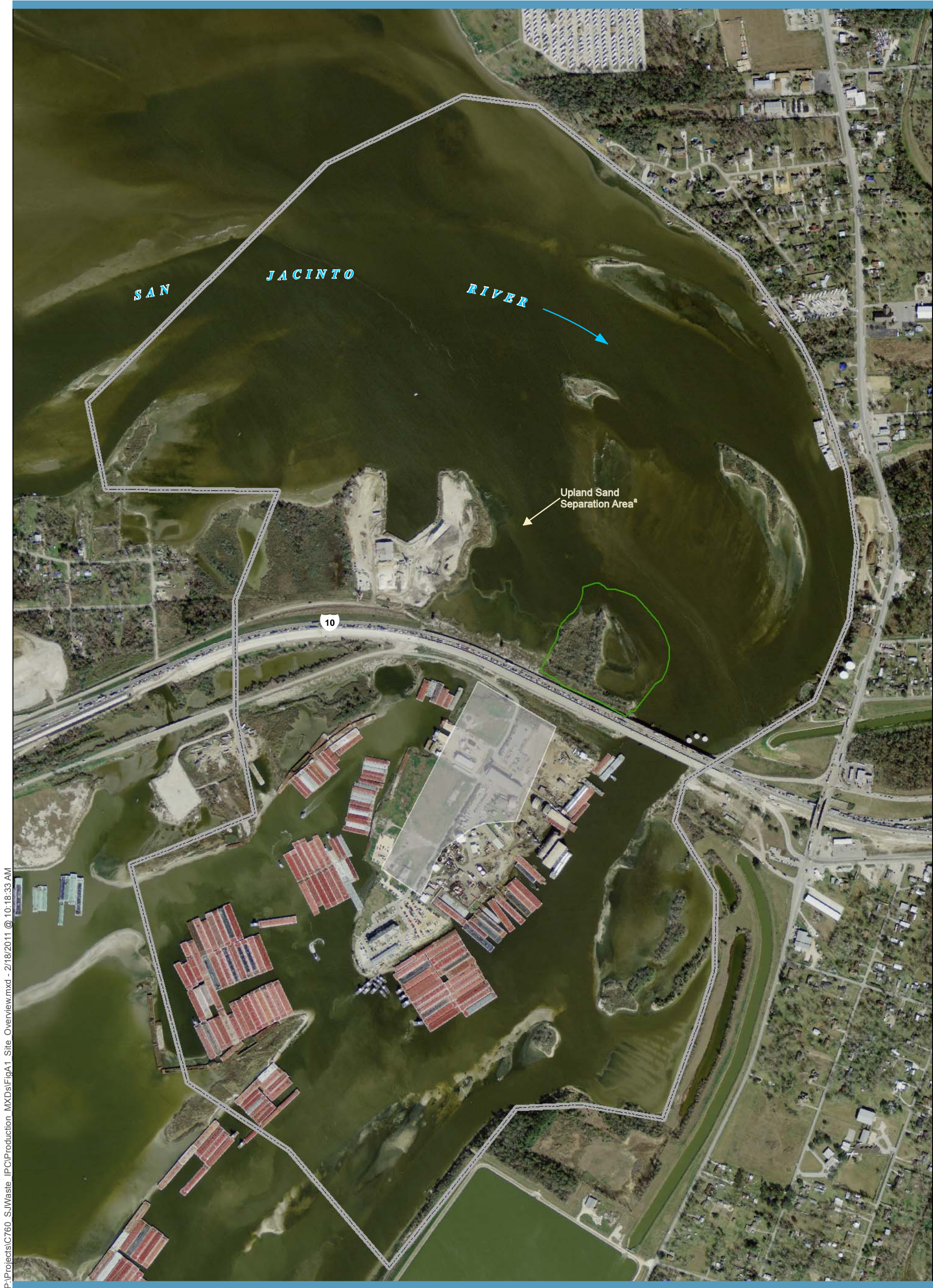
TOC = total organic carbon

a - NAD 1983; State Plane Texas South Central FIPS 4204; US feet

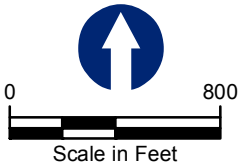
## FIGURES

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P:\Projects\IC760\_SJWaste\_IPC\Production\_MXD\Site\_Overview.mxd - 2/18/2011 @ 10:18:33 AM



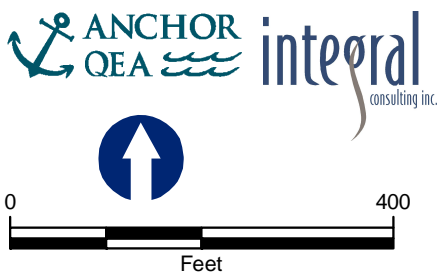
- USEPA's Preliminary Site Perimeter
- Original (1966) Perimeter of the Northern Impoundments
- Area of Soil Investigation South of I-10

\*Designation of the sand separation area is intended to be a general reference to areas in which such activities are believed to have taken place based on visual observations of aerial photography from 1998 through 2002.

FEATURE SOURCES:  
Aerial Imagery: 0.5-meter, Photo Date: 01/14/2009  
Texas Strategic Mapping Program (StratMap), TNRIS

**Figure A-1**  
Overview of Soil Study Area  
SJRWSP Soil SAP Addendum 1  
SJRWSP Superfund/IPC





- Soil Core at 2 Ft Intervals (Surface and Shallow Subsurface Sample Intervals: 0-6, 6-12 and 12-24 Inches)
- Soil Core at 2 Ft Intervals, Dioxins and Furans Only
- Potential Future Core Location
- Surface and Shallow Subsurface Sample Stations (0-6 and 6-12 Inches)
- Digitized State Department of Health Hand Drawn Map
- Flooded Area on 1966 Aerial Photograph
- Texas State Department of Health May 1966 Hand-Drawn Map (TSDH 1966)
- USGS 1966 Aerial Photograph South Impoundment Perimeter

**Figure A-2**  
Sample Locations for Area 4  
SJRWP Soil SAP Addendum 1  
SJRWP Superfund/IPC

ATTACHMENT A1

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STANDARD OPERATING  
PROCEDURES

STANDARD OPERATING  
PROCEDURE SL-06

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LOGGING OF SOIL  
BOREHOLES



## STANDARD OPERATING PROCEDURE (SOP) SL-06

### LOGGING OF SOIL BOREHOLES

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#### SCOPE AND APPLICATION

This SOP describes how to complete a Soil Boring Log form, which must be completed for Integral projects where soil boring techniques are performed during field exploration. A correctly completed form contains all of the information that must be recorded in the field to adequately characterize soil boreholes.

These procedures are adapted from ASTM D-2488-00. Field staff are encouraged to examine ASTM D-2488-00 in its entirety. This SOP represents minor modifications to emphasize environmental investigations rather than geotechnical investigations, for which the standards were written. Because each environmental project is unique and because job requirements can vary widely, the minimum standards presented may need to be supplemented with additional technical descriptions or field test results. However, all soil boring field logs, regardless of special project circumstances, must include information addressed in this SOP to achieve the minimum acceptable standards required by Integral.

#### LOG FORM INFORMATION

**Project Number**—Use the standard contract number.

**Client**—Identify the name of the client and the project site location.

**Location**—If stations, coordinates, mileposts, or similar markers are applicable, use them to identify the location of the project. If this information is not available, identify the facility (e.g., 20 ft NE of Retort #1).

**Drilling Method**—Identify the bit size and type, drilling fluid (if used), and method of drilling (e.g., rotary, hollow-stem auger, cable tool) and the name of the drill rig (e.g., Mobil B 61, CME 55).

**Diameter**—Provide the diameter of the borehole. If the borehole has variable diameters, provide the depth interval for each diameter.

**Sampling Method**—Identify the type of sampler(s) used (e.g., standard split spoon, Dames & Moore sampler, grab).

**Drilling Contractor**—Provide the name of the drilling contractor.



**Integral Staff**—Enter the name(s) of Integral staff members performing logging and sampling activities.

**Water Level Information**—Provide the date, time, depth to static water, and casing depth. Generally, water levels should be taken each day before resuming drilling and at the completion of drilling. If water is not encountered in the boring, this information should be recorded.

**Boring Number**—Provide the boring number. A numbering system should be developed prior to drilling that does not conflict with other site information, such as previous drilling or other sampling activities.

**Sheet**—Number the sheets consecutively for each boring and continue the consecutive depth numbering.

**Drilling Start and Finish**—Provide the drilling start and finish dates and times.

For consecutive sheets, provide (at a minimum) the job number, boring number, and sheet number.

## TECHNICAL DATA

**Sampler Type**—Provide the sampler type (e.g., SS = split spoon, G = grab).

**Depth of Casing**—Enter the depth of the casing below ground surface immediately prior to sampling.

**Driven/Recovery**—Provide the length that the sampler was driven and the length of sample recovered in the sampler. This column would not apply to grab samples.

**Sample Number/Sample Depth**—Provide the sample number. The sample numbering scheme should be established prior to drilling. One method is to use the boring number and consecutive alphabetical letters. For instance, the first sample obtained from boring MW-4 would be identified as 4A, the second would be identified as 4B, and so on. Another method for sample identification is naming the boring number with the depth. For example, the sample from Boring 1 at 10 ft would be labeled B1-10'. The depth of the sample is the depth of the casing plus the length to the middle of the recovered sample to the nearest 0.1 ft. Typically, split spoon samplers are 18 in. long. Samples should be obtained from the middle of the recovered sample. The depth of the sample with the casing at 10 ft would then be 10.7 ft.

**Number of Blows**—For standard split-spoon samplers, record the number of blows for each 6 in. of sampler penetration. A typical blow count of 6, 12, and 14 is recorded as 6/12/14. Refusal is a penetration of less than 6 in. with a blow count of 50. A partial penetration of 50 blows for 4 in. is recorded as 50/4". Total blows will be recorded for nonstandard split spoons (e.g., 5-ft tube used for continuous sampling).

**Blank Columns**—Two blank columns are provided. Use these columns for site-specific information, usually related to the chemicals of concern. Examples for a hydrocarbon site would be sheen and photoionization detector readings of the samples.

**Depth**—Use a depth scale that is appropriate for the complexity of the subsurface conditions. The boxes located to the right of the scale should be used to graphically indicate sample locations as shown in the example.

**Surface Conditions**—Describe the surface conditions (e.g., paved, 4-in. concrete slab, grass, natural vegetation and surface soil, oil-stained gravel).

**Soil Description**—Enter the soil classification and definition of soil contacts using the format described in SOP SL-04, *Field Classification of Soil*.

**Comments**—Include all pertinent observations. Drilling observations might include drilling chatter, rod-bounce (boulder), sudden differences in drilling speed, damaged samplers, and malfunctioning equipment. Information provided by the driller should be attributed to the driller. Information on possible contaminants might include odor, staining, color, and presence or absence of some indicator of contamination. Describe what it is that indicates contamination (e.g., fuel-like odor, oily sheen in drill cuttings, yellow water in drill cuttings).

## **ATTACHMENT 1. SOIL BORING LOG FORM**



319 SW Washington St., Suite 1150  
Portland, OR 97204  
(503) 284-5545

STATION NUMBER \_\_\_\_\_  
PROJECT \_\_\_\_\_  
LOCATION \_\_\_\_\_  
PROJECT NUMBER \_\_\_\_\_  
LOGGED BY \_\_\_\_\_

Page 1 of \_\_\_\_

SAMPLE INFORMATION						STRATA	DESCRIPTION
Sample ID	Depth	Time	Tag No.	% Recov.	Depth (Feet)		USCS group name, color, grain size range, minor constituents, plasticity, odor, sheen, moisture content, texture, weathering, cementation, geologic interpretation, etc.
					2--		
					4--		
					6--		
					8--		
					10--		
					12--		
					14--		

DRILLING CONTRACTOR \_\_\_\_\_  
DRILLING METHOD \_\_\_\_\_  
SAMPLING EQUIPMENT \_\_\_\_\_  
DRILLING STARTED \_\_\_\_\_  
COORDINATES \_\_\_\_\_  
SURFACE ELEVATION \_\_\_\_\_  
DATUM \_\_\_\_\_

Location Sketch

**ATTACHMENT 2. ASTM D 2488 – 00, STANDARD PRACTICE FOR  
DESCRIPTION AND IDENTIFICATION OF SOILS (VISUAL-MANUAL  
PROCEDURE)**



## Standard Practice for Description and Identification of Soils (Visual-Manual Procedure)<sup>1</sup>

This standard is issued under the fixed designation D 2488; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon ( $\epsilon$ ) indicates an editorial change since the last revision or reapproval.

*This standard has been approved for use by agencies of the Department of Defense.*

### 1. Scope \*

1.1 This practice covers procedures for the description of soils for engineering purposes.

1.2 This practice also describes a procedure for identifying soils, at the option of the user, based on the classification system described in Test Method D 2487. The identification is based on visual examination and manual tests. It must be clearly stated in reporting an identification that it is based on visual-manual procedures.

1.2.1 When precise classification of soils for engineering purposes is required, the procedures prescribed in Test Method D 2487 shall be used.

1.2.2 In this practice, the identification portion assigning a group symbol and name is limited to soil particles smaller than 3 in. (75 mm).

1.2.3 The identification portion of this practice is limited to naturally occurring soils (disturbed and undisturbed).

NOTE 1—This practice may be used as a descriptive system applied to such materials as shale, claystone, shells, crushed rock, etc. (see Appendix X2).

1.3 The descriptive information in this practice may be used with other soil classification systems or for materials other than naturally occurring soils.

1.4 The values stated in inch-pound units are to be regarded as the standard.

1.5 *This standard does not purport to address all of the safety problems, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use. For specific precautionary statements see Section 8.*

1.6 *This practice offers a set of instructions for performing one or more specific operations. This document cannot replace education or experience and should be used in conjunction with professional judgment. Not all aspects of this practice may be applicable in all circumstances. This ASTM standard is not*

*intended to represent or replace the standard of care by which the adequacy of a given professional service must be judged, nor should this document be applied without consideration of a project's many unique aspects. The word "Standard" in the title of this document means only that the document has been approved through the ASTM consensus process.*

### 2. Referenced Documents

#### 2.1 ASTM Standards:

D 653 Terminology Relating to Soil, Rock, and Contained Fluids<sup>2</sup>

D 1452 Practice for Soil Investigation and Sampling by Auger Borings<sup>2</sup>

D 1586 Test Method for Penetration Test and Split-Barrel Sampling of Soils<sup>2</sup>

D 1587 Practice for Thin-Walled Tube Sampling of Soils<sup>2</sup>

D 2113 Practice for Diamond Core Drilling for Site Investigation<sup>2</sup>

D 2487 Classification of Soils for Engineering Purposes (Unified Soil Classification System)<sup>2</sup>

D 3740 Practice for Minimum Requirements for Agencies Engaged in the Testing and/or Inspection of Soil and rock as Used in Engineering Design and Construction<sup>3</sup>

D 4083 Practice for Description of Frozen Soils (Visual-Manual Procedure)<sup>2</sup>

### 3. Terminology

3.1 *Definitions*—Except as listed below, all definitions are in accordance with Terminology D 653.

NOTE 2—For particles retained on a 3-in. (75-mm) US standard sieve, the following definitions are suggested:

*Cobbles*—particles of rock that will pass a 12-in. (300-mm) square opening and be retained on a 3-in. (75-mm) sieve, and

*Boulders*—particles of rock that will not pass a 12-in. (300-mm) square opening.

3.1.1 *clay*—soil passing a No. 200 (75- $\mu$ m) sieve that can be made to exhibit plasticity (putty-like properties) within a range of water contents, and that exhibits considerable strength when air-dry. For classification, a clay is a fine-grained soil, or the

<sup>1</sup> This practice is under the jurisdiction of ASTM Committee D-18 on Soil and Rock and is the direct responsibility of Subcommittee D18.07 on Identification and Classification of Soils.

Current edition approved Feb. 10, 2000. Published May 2000. Originally published as D 2488 – 66 T. Last previous edition D 2488 – 93<sup>1</sup>.

<sup>2</sup> *Annual Book of ASTM Standards*, Vol 04.08.

<sup>3</sup> *Annual Book of ASTM Standards*, Vol 04.09.

fine-grained portion of a soil, with a plasticity index equal to or greater than 4, and the plot of plasticity index versus liquid limit falls on or above the “A” line (see Fig. 3 of Test Method D 2487).

3.1.2 *gravel*—particles of rock that will pass a 3-in. (75-mm) sieve and be retained on a No. 4 (4.75-mm) sieve with the following subdivisions:

*coarse*—passes a 3-in. (75-mm) sieve and is retained on a ¾-in. (19-mm) sieve.

*fine*—passes a ¾-in. (19-mm) sieve and is retained on a No. 4 (4.75-mm) sieve.

3.1.3 *organic clay*—a clay with sufficient organic content to influence the soil properties. For classification, an organic clay is a soil that would be classified as a clay, except that its liquid limit value after oven drying is less than 75 % of its liquid limit value before oven drying.

3.1.4 *organic silt*—a silt with sufficient organic content to influence the soil properties. For classification, an organic silt is a soil that would be classified as a silt except that its liquid limit value after oven drying is less than 75 % of its liquid limit value before oven drying.

3.1.5 *peat*—a soil composed primarily of vegetable tissue in various stages of decomposition usually with an organic odor, a dark brown to black color, a spongy consistency, and a texture ranging from fibrous to amorphous.

3.1.6 *sand*—particles of rock that will pass a No. 4 (4.75-mm) sieve and be retained on a No. 200 (75-µm) sieve with the following subdivisions:

*coarse*—passes a No. 4 (4.75-mm) sieve and is retained on a No. 10 (2.00-mm) sieve.

*medium*—passes a No. 10 (2.00-mm) sieve and is retained on a No. 40 (425-µm) sieve.

*fine*—passes a No. 40 (425-µm) sieve and is retained on a No. 200 (75-µm) sieve.

3.1.7 *silt*—soil passing a No. 200 (75-µm) sieve that is nonplastic or very slightly plastic and that exhibits little or no strength when air dry. For classification, a silt is a fine-grained soil, or the fine-grained portion of a soil, with a plasticity index less than 4, or the plot of plasticity index versus liquid limit falls below the “A” line (see Fig. 3 of Test Method D 2487).

#### 4. Summary of Practice

4.1 Using visual examination and simple manual tests, this practice gives standardized criteria and procedures for describing and identifying soils.

4.2 The soil can be given an identification by assigning a group symbol(s) and name. The flow charts, Fig. 1a and Fig. 1b for fine-grained soils, and Fig. 2, for coarse-grained soils, can be used to assign the appropriate group symbol(s) and name. If the soil has properties which do not distinctly place it into a specific group, borderline symbols may be used, see Appendix X3.

NOTE 3—It is suggested that a distinction be made between *dual symbols* and *borderline symbols*.

*Dual Symbol*—A dual symbol is two symbols separated by a hyphen, for example, GP-GM, SW-SC, CL-ML used to indicate that the soil has been identified as having the properties of a classification in accordance with Test Method D 2487 where two symbols are required. Two symbols are required when the soil has between 5 and 12 % fines or when the liquid

limit and plasticity index values plot in the CL-ML area of the plasticity chart.

*Borderline Symbol*—A borderline symbol is two symbols separated by a slash, for example, CL/CH, GM/SM, CL/ML. A borderline symbol should be used to indicate that the soil has been identified as having properties that do not distinctly place the soil into a specific group (see Appendix X3).

#### 5. Significance and Use

5.1 The descriptive information required in this practice can be used to describe a soil to aid in the evaluation of its significant properties for engineering use.

5.2 The descriptive information required in this practice should be used to supplement the classification of a soil as determined by Test Method D 2487.

5.3 This practice may be used in identifying soils using the classification group symbols and names as prescribed in Test Method D 2487. Since the names and symbols used in this practice to identify the soils are the same as those used in Test Method D 2487, it shall be clearly stated in reports and all other appropriate documents, that the classification symbol and name are based on visual-manual procedures.

5.4 This practice is to be used not only for identification of soils in the field, but also in the office, laboratory, or wherever soil samples are inspected and described.

5.5 This practice has particular value in grouping similar soil samples so that only a minimum number of laboratory tests need be run for positive soil classification.

NOTE 4—The ability to describe and identify soils correctly is learned more readily under the guidance of experienced personnel, but it may also be acquired systematically by comparing numerical laboratory test results for typical soils of each type with their visual and manual characteristics.

5.6 When describing and identifying soil samples from a given boring, test pit, or group of borings or pits, it is not necessary to follow all of the procedures in this practice for every sample. Soils which appear to be similar can be grouped together; one sample completely described and identified with the others referred to as similar based on performing only a few of the descriptive and identification procedures described in this practice.

5.7 This practice may be used in combination with Practice D 4083 when working with frozen soils.

NOTE 5—Notwithstanding the statements on precision and bias contained in this standard: The precision of this test method is dependent on the competence of the personnel performing it and the suitability of the equipment and facilities used. Agencies that meet the criteria of Practice D 3740 are generally considered capable of competent and objective testing. Users of this test method are cautioned that compliance with Practice D 3740 does not in itself assure reliable testing. Reliable testing depends on several factors; Practice D 3740 provides a means for evaluating some of those factors.

#### 6. Apparatus

6.1 *Required Apparatus:*

6.1.1 *Pocket Knife or Small Spatula.*

6.2 *Useful Auxiliary Apparatus:*

6.2.1 *Small Test Tube and Stopper* (or jar with a lid).

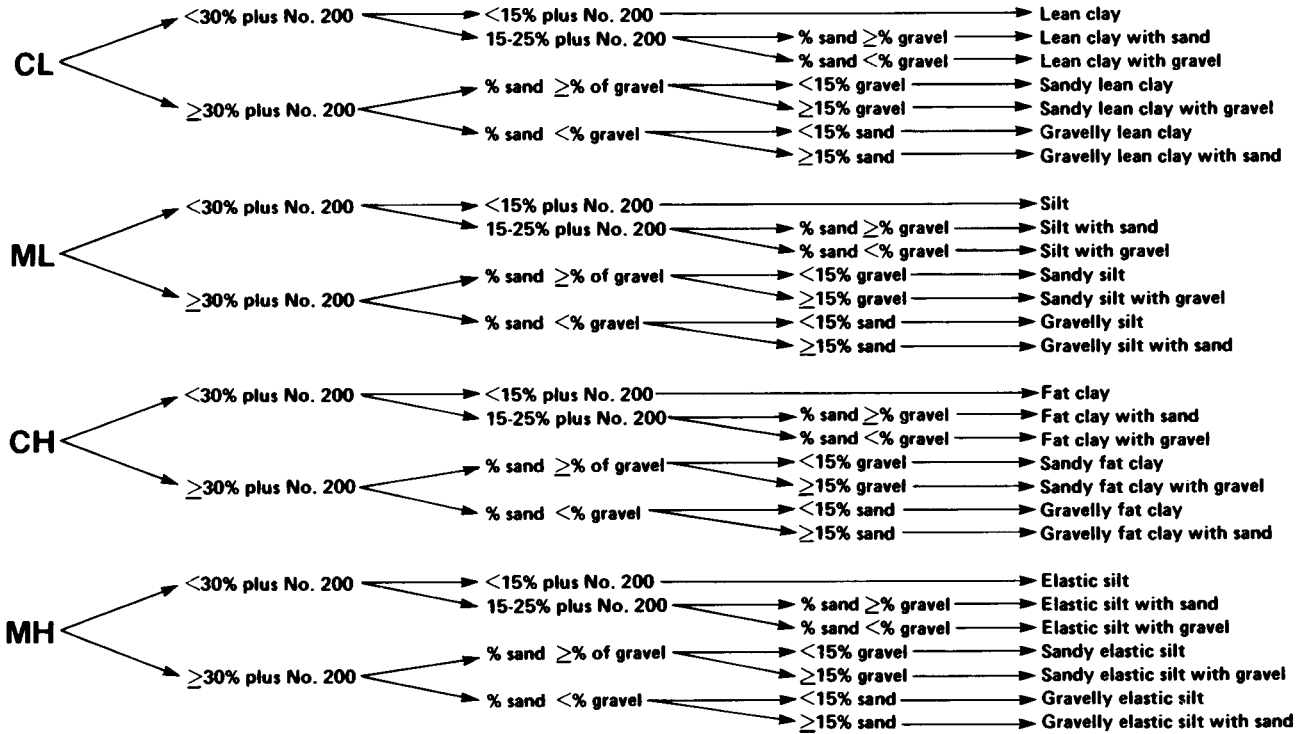
6.2.2 *Small Hand Lens.*

#### 7. Reagents

7.1 *Purity of Water*—Unless otherwise indicated, references

**GROUP SYMBOL**

**GROUP NAME**

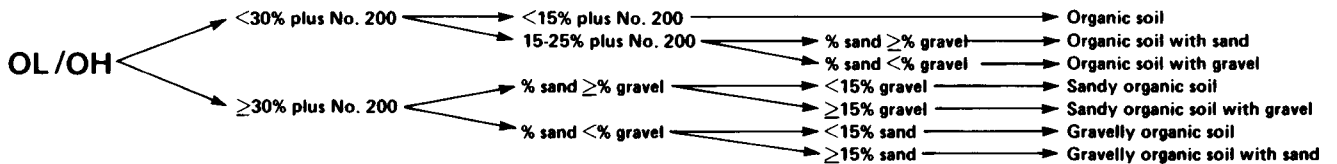


NOTE 1—Percentages are based on estimating amounts of fines, sand, and gravel to the nearest 5 %.

FIG. 1a Flow Chart for Identifying Inorganic Fine-Grained Soil (50 % or more fines)

**GROUP SYMBOL**

**GROUP NAME**



NOTE 1—Percentages are based on estimating amounts of fines, sand, and gravel to the nearest 5 %.

FIG. 1 b Flow Chart for Identifying Organic Fine-Grained Soil (50 % or more fines)

to water shall be understood to mean water from a city water supply or natural source, including non-potable water.

7.2 *Hydrochloric Acid*—A small bottle of dilute hydrochloric acid, HCl, one part HCl (10 *N*) to three parts water (This reagent is optional for use with this practice). See Section 8.

## 8. Safety Precautions

8.1 When preparing the dilute HCl solution of one part concentrated hydrochloric acid (10 *N*) to three parts of distilled water, slowly add acid into water following necessary safety precautions. Handle with caution and store safely. If solution comes into contact with the skin, rinse thoroughly with water.

8.2 **Caution**—Do not add water to acid.

## 9. Sampling

9.1 The sample shall be considered to be representative of the stratum from which it was obtained by an appropriate, accepted, or standard procedure.

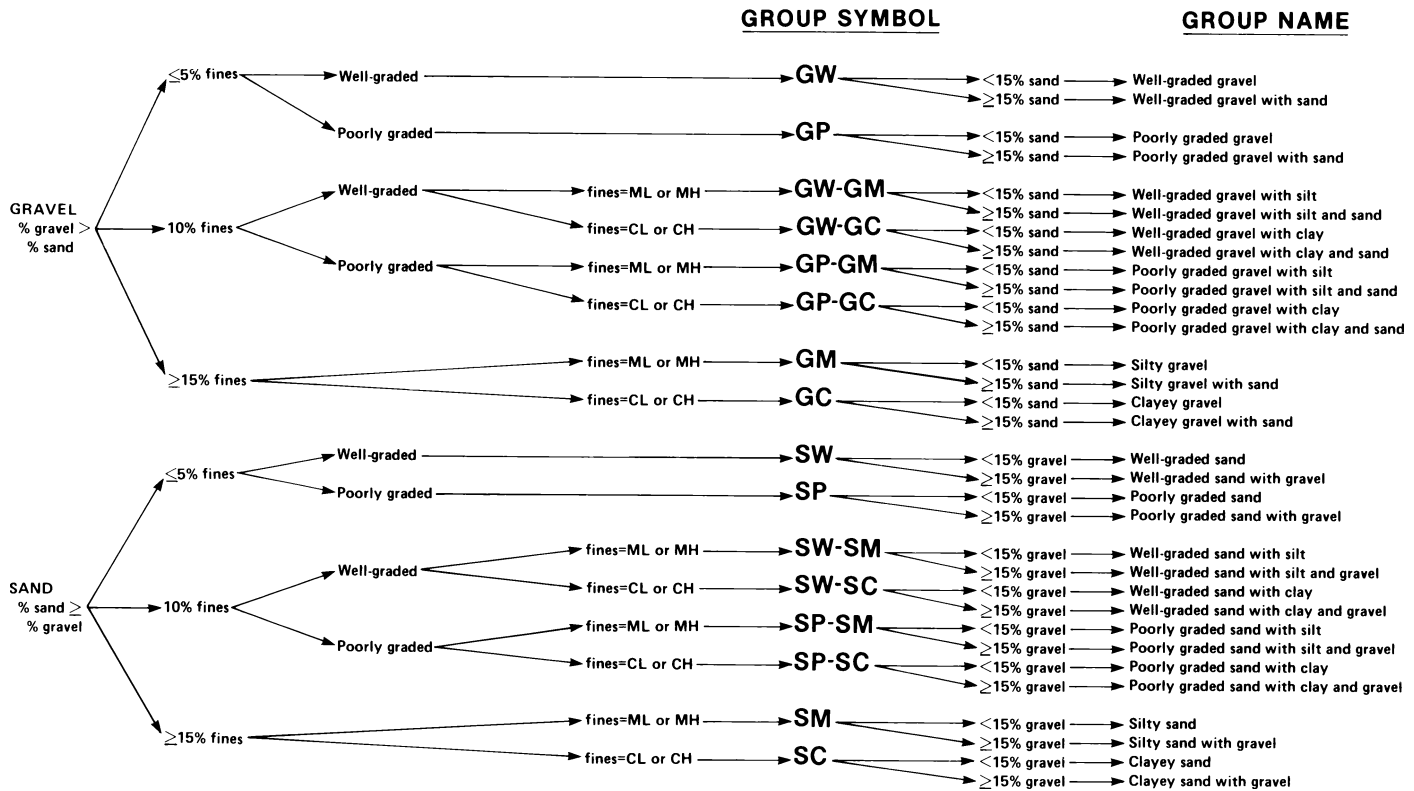
NOTE 6—Preferably, the sampling procedure should be identified as having been conducted in accordance with Practices D 1452, D 1587, or D 2113, or Test Method D 1586.

9.2 The sample shall be carefully identified as to origin.

NOTE 7—Remarks as to the origin may take the form of a boring number and sample number in conjunction with a job number, a geologic stratum, a pedologic horizon or a location description with respect to a permanent monument, a grid system or a station number and offset with respect to a stated centerline and a depth or elevation.

9.3 For accurate description and identification, the minimum amount of the specimen to be examined shall be in accordance with the following schedule:





NOTE 1—Percentages are based on estimating amounts of fines, sand, and gravel to the nearest 5 %.

**FIG. 2 Flow Chart for Identifying Coarse-Grained Soils (less than 50 % fines)**

Maximum Particle Size, Sieve Opening	Minimum Specimen Size, Dry Weight
4.75 mm (No. 4)	100 g (0.25 lb)
9.5 mm (¾ in.)	200 g (0.5 lb)
19.0 mm (¾ in.)	1.0 kg (2.2 lb)
38.1 mm (1½ in.)	8.0 kg (18 lb)
75.0 mm (3 in.)	60.0 kg (132 lb)

NOTE 8—If random isolated particles are encountered that are significantly larger than the particles in the soil matrix, the soil matrix can be accurately described and identified in accordance with the preceding schedule.

9.4 If the field sample or specimen being examined is smaller than the minimum recommended amount, the report shall include an appropriate remark.

## 10. Descriptive Information for Soils

10.1 *Angularity*—Describe the angularity of the sand (coarse sizes only), gravel, cobbles, and boulders, as angular, subangular, subrounded, or rounded in accordance with the criteria in Table 1 and Fig. 3. A range of angularity may be stated, such as: subrounded to rounded.

10.2 *Shape*—Describe the shape of the gravel, cobbles, and boulders as flat, elongated, or flat and elongated if they meet the criteria in Table 2 and Fig. 4. Otherwise, do not mention the shape. Indicate the fraction of the particles that have the shape, such as: one-third of the gravel particles are flat.

10.3 *Color*—Describe the color. Color is an important property in identifying organic soils, and within a given locality it may also be useful in identifying materials of similar geologic origin. If the sample contains layers or patches of

**TABLE 1 Criteria for Describing Angularity of Coarse-Grained Particles (see Fig. 3)**

Description	Criteria
Angular	Particles have sharp edges and relatively plane sides with unpolished surfaces
Subangular	Particles are similar to angular description but have rounded edges
Subrounded	Particles have nearly plane sides but have well-rounded corners and edges
Rounded	Particles have smoothly curved sides and no edges

varying colors, this shall be noted and all representative colors shall be described. The color shall be described for moist samples. If the color represents a dry condition, this shall be stated in the report.

10.4 *Odor*—Describe the odor if organic or unusual. Soils containing a significant amount of organic material usually have a distinctive odor of decaying vegetation. This is especially apparent in fresh samples, but if the samples are dried, the odor may often be revived by heating a moistened sample. If the odor is unusual (petroleum product, chemical, and the like), it shall be described.

10.5 *Moisture Condition*—Describe the moisture condition as dry, moist, or wet, in accordance with the criteria in Table 3.

10.6 *HCl Reaction*—Describe the reaction with HCl as none, weak, or strong, in accordance with the criteria in Table 4. Since calcium carbonate is a common cementing agent, a report of its presence on the basis of the reaction with dilute hydrochloric acid is important.

10.7 *Consistency*—For intact fine-grained soil, describe the

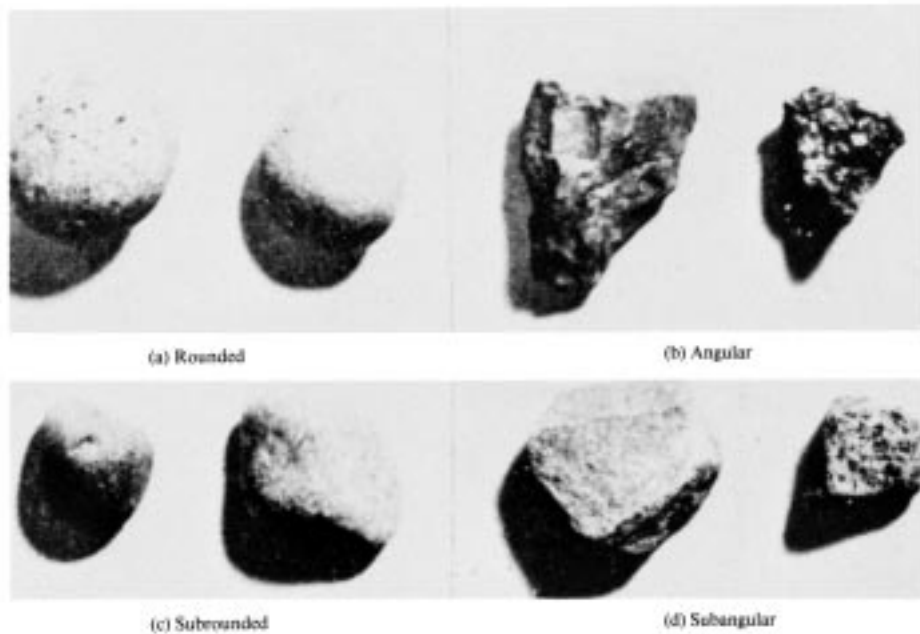


FIG. 3 Typical Angularity of Bulky Grains

TABLE 2 Criteria for Describing Particle Shape (see Fig. 4)

The particle shape shall be described as follows where length, width, and thickness refer to the greatest, intermediate, and least dimensions of a particle, respectively.

Flat	Particles with width/thickness $> 3$
Elongated	Particles with length/width $> 3$
Flat and elongated	Particles meet criteria for both flat and elongated

consistency as very soft, soft, firm, hard, or very hard, in accordance with the criteria in Table 5. This observation is inappropriate for soils with significant amounts of gravel.

10.8 *Cementation*—Describe the cementation of intact coarse-grained soils as weak, moderate, or strong, in accordance with the criteria in Table 6.

10.9 *Structure*—Describe the structure of intact soils in accordance with the criteria in Table 7.

10.10 *Range of Particle Sizes*—For gravel and sand components, describe the range of particle sizes within each component as defined in 3.1.2 and 3.1.6. For example, about 20 % fine to coarse gravel, about 40 % fine to coarse sand.

10.11 *Maximum Particle Size*—Describe the maximum particle size found in the sample in accordance with the following information:

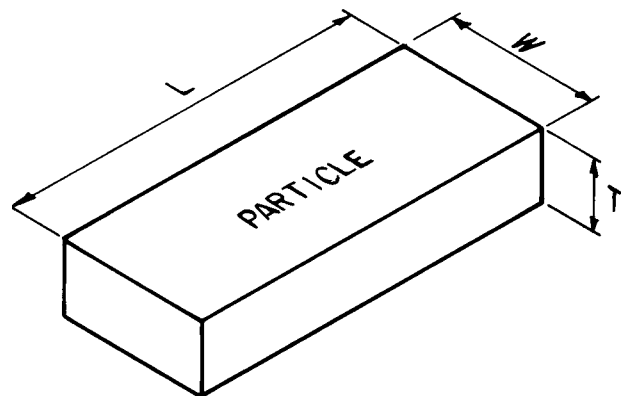
10.11.1 *Sand Size*—If the maximum particle size is a sand size, describe as fine, medium, or coarse as defined in 3.1.6. For example: maximum particle size, medium sand.

10.11.2 *Gravel Size*—If the maximum particle size is a gravel size, describe the maximum particle size as the smallest sieve opening that the particle will pass. For example, maximum particle size, 1½ in. (will pass a 1½-in. square opening but not a ¾-in. square opening).

10.11.3 *Cobble or Boulder Size*—If the maximum particle size is a cobble or boulder size, describe the maximum dimension of the largest particle. For example: maximum dimension, 18 in. (450 mm).

## PARTICLE SHAPE

W = WIDTH  
T = THICKNESS  
L = LENGTH



FLAT:  $W/T > 3$   
ELONGATED:  $L/W > 3$   
FLAT AND ELONGATED:  
-meets both criteria

FIG. 4 Criteria for Particle Shape

10.12 *Hardness*—Describe the hardness of coarse sand and larger particles as hard, or state what happens when the

**TABLE 3 Criteria for Describing Moisture Condition**

Description	Criteria
Dry	Absence of moisture, dusty, dry to the touch
Moist	Damp but no visible water
Wet	Visible free water, usually soil is below water table

**TABLE 4 Criteria for Describing the Reaction With HCl**

Description	Criteria
None	No visible reaction
Weak	Some reaction, with bubbles forming slowly
Strong	Violent reaction, with bubbles forming immediately

**TABLE 5 Criteria for Describing Consistency**

Description	Criteria
Very soft	Thumb will penetrate soil more than 1 in. (25 mm)
Soft	Thumb will penetrate soil about 1 in. (25 mm)
Firm	Thumb will indent soil about ¼ in. (6 mm)
Hard	Thumb will not indent soil but readily indented with thumbnail
Very hard	Thumbnail will not indent soil

**TABLE 6 Criteria for Describing Cementation**

Description	Criteria
Weak	Crumbles or breaks with handling or little finger pressure
Moderate	Crumbles or breaks with considerable finger pressure
Strong	Will not crumble or break with finger pressure

**TABLE 7 Criteria for Describing Structure**

Description	Criteria
Stratified	Alternating layers of varying material or color with layers at least 6 mm thick; note thickness
Laminated	Alternating layers of varying material or color with the layers less than 6 mm thick; note thickness
Fissured	Breaks along definite planes of fracture with little resistance to fracturing
Slickensided	Fracture planes appear polished or glossy, sometimes striated
Blocky	Cohesive soil that can be broken down into small angular lumps which resist further breakdown
Lensed	Inclusion of small pockets of different soils, such as small lenses of sand scattered through a mass of clay; note thickness
Homogeneous	Same color and appearance throughout

particles are hit by a hammer, for example, gravel-size particles fracture with considerable hammer blow, some gravel-size particles crumble with hammer blow. "Hard" means particles do not crack, fracture, or crumble under a hammer blow.

10.13 Additional comments shall be noted, such as the presence of roots or root holes, difficulty in drilling or augering hole, caving of trench or hole, or the presence of mica.

10.14 A local or commercial name or a geologic interpretation of the soil, or both, may be added if identified as such.

10.15 A classification or identification of the soil in accordance with other classification systems may be added if identified as such.

## 11. Identification of Peat

11.1 A sample composed primarily of vegetable tissue in various stages of decomposition that has a fibrous to amor-

phous texture, usually a dark brown to black color, and an organic odor, shall be designated as a highly organic soil and shall be identified as peat, PT, and not subjected to the identification procedures described hereafter.

## 12. Preparation for Identification

12.1 The soil identification portion of this practice is based on the portion of the soil sample that will pass a 3-in. (75-mm) sieve. The larger than 3-in. (75-mm) particles must be removed, manually, for a loose sample, or mentally, for an intact sample before classifying the soil.

12.2 Estimate and note the percentage of cobbles and the percentage of boulders. Performed visually, these estimates will be on the basis of volume percentage.

NOTE 9—Since the percentages of the particle-size distribution in Test Method D 2487 are by dry weight, and the estimates of percentages for gravel, sand, and fines in this practice are by dry weight, it is recommended that the report state that the percentages of cobbles and boulders are by volume.

12.3 Of the fraction of the soil smaller than 3 in. (75 mm), estimate and note the percentage, by dry weight, of the gravel, sand, and fines (see Appendix X4 for suggested procedures).

NOTE 10—Since the particle-size components appear visually on the basis of volume, considerable experience is required to estimate the percentages on the basis of dry weight. Frequent comparisons with laboratory particle-size analyses should be made.

12.3.1 The percentages shall be estimated to the closest 5 %. The percentages of gravel, sand, and fines must add up to 100 %.

12.3.2 If one of the components is present but not in sufficient quantity to be considered 5 % of the smaller than 3-in. (75-mm) portion, indicate its presence by the term *trace*, for example, trace of fines. A trace is not to be considered in the total of 100 % for the components.

## 13. Preliminary Identification

13.1 The soil is *fine grained* if it contains 50 % or more fines. Follow the procedures for identifying fine-grained soils of Section 14.

13.2 The soil is *coarse grained* if it contains less than 50 % fines. Follow the procedures for identifying coarse-grained soils of Section 15.

## 14. Procedure for Identifying Fine-Grained Soils

14.1 Select a representative sample of the material for examination. Remove particles larger than the No. 40 sieve (medium sand and larger) until a specimen equivalent to about a handful of material is available. Use this specimen for performing the dry strength, dilatancy, and toughness tests.

### 14.2 Dry Strength:

14.2.1 From the specimen, select enough material to mold into a ball about 1 in. (25 mm) in diameter. Mold the material until it has the consistency of putty, adding water if necessary.

14.2.2 From the molded material, make at least three test specimens. A test specimen shall be a ball of material about ½ in. (12 mm) in diameter. Allow the test specimens to dry in air, or sun, or by artificial means, as long as the temperature does not exceed 60°C.

14.2.3 If the test specimen contains natural dry lumps, those that are about ½ in. (12 mm) in diameter may be used in place of the molded balls.

NOTE 11—The process of molding and drying usually produces higher strengths than are found in natural dry lumps of soil.

14.2.4 Test the strength of the dry balls or lumps by crushing between the fingers. Note the strength as none, low, medium, high, or very high in accordance with the criteria in Table 8. If natural dry lumps are used, do not use the results of any of the lumps that are found to contain particles of coarse sand.

14.2.5 The presence of high-strength water-soluble cementing materials, such as calcium carbonate, may cause exceptionally high dry strengths. The presence of calcium carbonate can usually be detected from the intensity of the reaction with dilute hydrochloric acid (see 10.6).

#### 14.3 Dilatancy:

14.3.1 From the specimen, select enough material to mold into a ball about ½ in. (12 mm) in diameter. Mold the material, adding water if necessary, until it has a soft, but not sticky, consistency.

14.3.2 Smooth the soil ball in the palm of one hand with the blade of a knife or small spatula. Shake horizontally, striking the side of the hand vigorously against the other hand several times. Note the reaction of water appearing on the surface of the soil. Squeeze the sample by closing the hand or pinching the soil between the fingers, and note the reaction as none, slow, or rapid in accordance with the criteria in Table 9. The reaction is the speed with which water appears while shaking, and disappears while squeezing.

#### 14.4 Toughness:

14.4.1 Following the completion of the dilatancy test, the test specimen is shaped into an elongated pat and rolled by hand on a smooth surface or between the palms into a thread about ⅛ in. (3 mm) in diameter. (If the sample is too wet to roll easily, it should be spread into a thin layer and allowed to lose some water by evaporation.) Fold the sample threads and reroll repeatedly until the thread crumbles at a diameter of about ⅛ in. The thread will crumble at a diameter of ⅛ in. when the soil is near the plastic limit. Note the pressure required to roll the thread near the plastic limit. Also, note the strength of the thread. After the thread crumbles, the pieces should be lumped together and kneaded until the lump crumbles. Note the toughness of the material during kneading.

14.4.2 Describe the toughness of the thread and lump as

**TABLE 8 Criteria for Describing Dry Strength**

Description	Criteria
None	The dry specimen crumbles into powder with mere pressure of handling
Low	The dry specimen crumbles into powder with some finger pressure
Medium	The dry specimen breaks into pieces or crumbles with considerable finger pressure
High	The dry specimen cannot be broken with finger pressure. Specimen will break into pieces between thumb and a hard surface
Very high	The dry specimen cannot be broken between the thumb and a hard surface

**TABLE 9 Criteria for Describing Dilatancy**

Description	Criteria
None	No visible change in the specimen
Slow	Water appears slowly on the surface of the specimen during shaking and does not disappear or disappears slowly upon squeezing
Rapid	Water appears quickly on the surface of the specimen during shaking and disappears quickly upon squeezing

low, medium, or high in accordance with the criteria in Table 10.

14.5 *Plasticity*—On the basis of observations made during the toughness test, describe the plasticity of the material in accordance with the criteria given in Table 11.

14.6 Decide whether the soil is an *inorganic* or an *organic* fine-grained soil (see 14.8). If inorganic, follow the steps given in 14.7.

#### 14.7 Identification of Inorganic Fine-Grained Soils:

14.7.1 Identify the soil as a *lean clay*, CL, if the soil has medium to high dry strength, no or slow dilatancy, and medium toughness and plasticity (see Table 12).

14.7.2 Identify the soil as a *fat clay*, CH, if the soil has high to very high dry strength, no dilatancy, and high toughness and plasticity (see Table 12).

14.7.3 Identify the soil as a *silt*, ML, if the soil has no to low dry strength, slow to rapid dilatancy, and low toughness and plasticity, or is nonplastic (see Table 12).

14.7.4 Identify the soil as an *elastic silt*, MH, if the soil has low to medium dry strength, no to slow dilatancy, and low to medium toughness and plasticity (see Table 12).

NOTE 12—These properties are similar to those for a lean clay. However, the silt will dry quickly on the hand and have a smooth, silky feel when dry. Some soils that would classify as MH in accordance with the criteria in Test Method D 2487 are visually difficult to distinguish from lean clays, CL. It may be necessary to perform laboratory testing for proper identification.

#### 14.8 Identification of Organic Fine-Grained Soils:

14.8.1 Identify the soil as an *organic soil*, OL/OH, if the soil contains enough organic particles to influence the soil properties. Organic soils usually have a dark brown to black color and may have an organic odor. Often, organic soils will change color, for example, black to brown, when exposed to the air. Some organic soils will lighten in color significantly when air dried. Organic soils normally will not have a high toughness or plasticity. The thread for the toughness test will be spongy.

NOTE 13—In some cases, through practice and experience, it may be possible to further identify the organic soils as organic silts or organic clays, OL or OH. Correlations between the dilatancy, dry strength, toughness tests, and laboratory tests can be made to identify organic soils in certain deposits of similar materials of known geologic origin.

**TABLE 10 Criteria for Describing Toughness**

Description	Criteria
Low	Only slight pressure is required to roll the thread near the plastic limit. The thread and the lump are weak and soft
Medium	Medium pressure is required to roll the thread to near the plastic limit. The thread and the lump have medium stiffness
High	Considerable pressure is required to roll the thread to near the plastic limit. The thread and the lump have very high stiffness





TABLE 11 Criteria for Describing Plasticity

Description	Criteria
Nonplastic	A 1/8-in. (3-mm) thread cannot be rolled at any water content
Low	The thread can barely be rolled and the lump cannot be formed when drier than the plastic limit
Medium	The thread is easy to roll and not much time is required to reach the plastic limit. The thread cannot be rerolled after reaching the plastic limit. The lump crumbles when drier than the plastic limit
High	It takes considerable time rolling and kneading to reach the plastic limit. The thread can be rerolled several times after reaching the plastic limit. The lump can be formed without crumbling when drier than the plastic limit

TABLE 12 Identification of Inorganic Fine-Grained Soils from Manual Tests

Soil Symbol	Dry Strength	Dilatancy	Toughness
ML	None to low	Slow to rapid	Low or thread cannot be formed
CL	Medium to high	None to slow	Medium
MH	Low to medium	None to slow	Low to medium
CH	High to very high	None	High

14.9 If the soil is estimated to have 15 to 25 % sand or gravel, or both, the words “with sand” or “with gravel” (whichever is more predominant) shall be added to the group name. For example: “lean clay with sand, CL” or “silt with gravel, ML” (see Fig. 1a and Fig. 1b). If the percentage of sand is equal to the percentage of gravel, use “with sand.”

14.10 If the soil is estimated to have 30 % or more sand or gravel, or both, the words “sandy” or “gravelly” shall be added to the group name. Add the word “sandy” if there appears to be more sand than gravel. Add the word “gravelly” if there appears to be more gravel than sand. For example: “sandy lean clay, CL”, “gravelly fat clay, CH”, or “sandy silt, ML” (see Fig. 1a and Fig. 1b). If the percentage of sand is equal to the percent of gravel, use “sandy.”

## 15. Procedure for Identifying Coarse-Grained Soils (Contains less than 50 % fines)

15.1 The soil is a *gravel* if the percentage of gravel is estimated to be more than the percentage of sand.

15.2 The soil is a *sand* if the percentage of gravel is estimated to be equal to or less than the percentage of sand.

15.3 The soil is a *clean gravel* or *clean sand* if the percentage of fines is estimated to be 5 % or less.

15.3.1 Identify the soil as a *well-graded gravel*, GW, or as a *well-graded sand*, SW, if it has a wide range of particle sizes and substantial amounts of the intermediate particle sizes.

15.3.2 Identify the soil as a *poorly graded gravel*, GP, or as a *poorly graded sand*, SP, if it consists predominantly of one size (uniformly graded), or it has a wide range of sizes with some intermediate sizes obviously missing (gap or skip graded).

15.4 The soil is either a *gravel with fines* or a *sand with fines* if the percentage of fines is estimated to be 15 % or more.

15.4.1 Identify the soil as a *clayey gravel*, GC, or a *clayey sand*, SC, if the fines are clayey as determined by the procedures in Section 14.

15.4.2 Identify the soil as a *silty gravel*, GM, or a *silty sand*,

SM, if the fines are silty as determined by the procedures in Section 14.

15.5 If the soil is estimated to contain 10 % fines, give the soil a dual identification using two group symbols.

15.5.1 The first group symbol shall correspond to a clean gravel or sand (GW, GP, SW, SP) and the second symbol shall correspond to a gravel or sand with fines (GC, GM, SC, SM).

15.5.2 The group name shall correspond to the first group symbol plus the words “with clay” or “with silt” to indicate the plasticity characteristics of the fines. For example: “well-graded gravel with clay, GW-GC” or “poorly graded sand with silt, SP-SM” (see Fig. 2).

15.6 If the specimen is predominantly sand or gravel but contains an estimated 15 % or more of the other coarse-grained constituent, the words “with gravel” or “with sand” shall be added to the group name. For example: “poorly graded gravel with sand, GP” or “clayey sand with gravel, SC” (see Fig. 2).

15.7 If the field sample contains any cobbles or boulders, or both, the words “with cobbles” or “with cobbles and boulders” shall be added to the group name. For example: “silty gravel with cobbles, GM.”

## 16. Report

16.1 The report shall include the information as to origin, and the items indicated in Table 13.

NOTE 14—*Example: Clayey Gravel with Sand and Cobbles, GC*—About 50 % fine to coarse, subrounded to subangular gravel; about 30 % fine to coarse, subrounded sand; about 20 % fines with medium plasticity, high dry strength, no dilatancy, medium toughness; weak reaction with HCl; original field sample had about 5 % (by volume) subrounded cobbles, maximum dimension, 150 mm.

In-Place Conditions—Firm, homogeneous, dry, brown

Geologic Interpretation—Alluvial fan

TABLE 13 Checklist for Description of Soils

1. Group name
2. Group symbol
3. Percent of cobbles or boulders, or both (by volume)
4. Percent of gravel, sand, or fines, or all three (by dry weight)
5. Particle-size range:
Gravel—fine, coarse
Sand—fine, medium, coarse
6. Particle angularity: angular, subangular, subrounded, rounded
7. Particle shape: (if appropriate) flat, elongated, flat and elongated
8. Maximum particle size or dimension
9. Hardness of coarse sand and larger particles
10. Plasticity of fines: nonplastic, low, medium, high
11. Dry strength: none, low, medium, high, very high
12. Dilatancy: none, slow, rapid
13. Toughness: low, medium, high
14. Color (in moist condition)
15. Odor (mention only if organic or unusual)
16. Moisture: dry, moist, wet
17. Reaction with HCl: none, weak, strong
For intact samples:
18. Consistency (fine-grained soils only): very soft, soft, firm, hard, very hard
19. Structure: stratified, laminated, fissured, slickensided, lensed, homogeneous
20. Cementation: weak, moderate, strong
21. Local name
22. Geologic interpretation
23. Additional comments: presence of roots or root holes, presence of mica, gypsum, etc., surface coatings on coarse-grained particles, caving or sloughing of auger hole or trench sides, difficulty in augering or excavating, etc.



NOTE 15—Other examples of soil descriptions and identification are given in Appendix X1 and Appendix X2.

NOTE 16—If desired, the percentages of gravel, sand, and fines may be stated in terms indicating a range of percentages, as follows:

*Trace*—Particles are present but estimated to be less than 5 %

*Few*—5 to 10 %

*Little*—15 to 25 %

*Some*—30 to 45 %

*Mostly*—50 to 100 %

16.2 If, in the soil description, the soil is identified using a classification group symbol and name as described in Test Method D 2487, it must be distinctly and clearly stated in log

forms, summary tables, reports, and the like, that the symbol and name are based on visual-manual procedures.

## 17. Precision and Bias

17.1 This practice provides qualitative information only, therefore, a precision and bias statement is not applicable.

## 18. Keywords

18.1 classification; clay; gravel; organic soils; sand; silt; soil classification; soil description; visual classification

# APPENDIXES

## (Nonmandatory Information)

### X1. EXAMPLES OF VISUAL SOIL DESCRIPTIONS

X1.1 The following examples show how the information required in 16.1 can be reported. The information that is included in descriptions should be based on individual circumstances and need.

X1.1.1 *Well-Graded Gravel with Sand (GW)*—About 75 % fine to coarse, hard, subangular gravel; about 25 % fine to coarse, hard, subangular sand; trace of fines; maximum size, 75 mm, brown, dry; no reaction with HCl.

X1.1.2 *Silty Sand with Gravel (SM)*—About 60 % predominantly fine sand; about 25 % silty fines with low plasticity, low dry strength, rapid dilatancy, and low toughness; about 15 % fine, hard, subrounded gravel, a few gravel-size particles fractured with hammer blow; maximum size, 25 mm; no reaction with HCl (Note—Field sample size smaller than recommended).

*In-Place Conditions*—Firm, stratified and contains lenses of silt 1 to 2 in. (25 to 50 mm) thick, moist, brown to gray; in-place density 106 lb/ft<sup>3</sup>; in-place moisture 9 %.

X1.1.3 *Organic Soil (OL/OH)*—About 100 % fines with low plasticity, slow dilatancy, low dry strength, and low toughness; wet, dark brown, organic odor; weak reaction with HCl.

X1.1.4 *Silty Sand with Organic Fines (SM)*—About 75 % fine to coarse, hard, subangular reddish sand; about 25 % organic and silty dark brown nonplastic fines with no dry strength and slow dilatancy; wet; maximum size, coarse sand; weak reaction with HCl.

X1.1.5 *Poorly Graded Gravel with Silt, Sand, Cobbles and Boulders (GP-GM)*—About 75 % fine to coarse, hard, subrounded to subangular gravel; about 15 % fine, hard, subrounded to subangular sand; about 10 % silty nonplastic fines; moist, brown; no reaction with HCl; original field sample had about 5 % (by volume) hard, subrounded cobbles and a trace of hard, subrounded boulders, with a maximum dimension of 18 in. (450 mm).

### X2. USING THE IDENTIFICATION PROCEDURE AS A DESCRIPTIVE SYSTEM FOR SHALE, CLAYSTONE, SHELLS, SLAG, CRUSHED ROCK, AND THE LIKE

X2.1 The identification procedure may be used as a descriptive system applied to materials that exist in-situ as shale, claystone, sandstone, siltstone, mudstone, etc., but convert to soils after field or laboratory processing (crushing, slaking, and the like).

X2.2 Materials such as shells, crushed rock, slag, and the like, should be identified as such. However, the procedures used in this practice for describing the particle size and plasticity characteristics may be used in the description of the material. If desired, an identification using a group name and symbol according to this practice may be assigned to aid in describing the material.

X2.3 The group symbol(s) and group names should be placed in quotation marks or noted with some type of distinguishing symbol. See examples.

X2.4 Examples of how group names and symbols can be incorporated into a descriptive system for materials that are not naturally occurring soils are as follows:

X2.4.1 *Shale Chunks*—Retrieved as 2 to 4-in. (50 to 100-mm) pieces of shale from power auger hole, dry, brown, no reaction with HCl. After slaking in water for 24 h, material identified as “Sandy Lean Clay (CL)”; about 60 % fines with medium plasticity, high dry strength, no dilatancy, and medium toughness; about 35 % fine to medium, hard sand; about 5 % gravel-size pieces of shale.

X2.4.2 *Crushed Sandstone*—Product of commercial crushing operation; “Poorly Graded Sand with Silt (SP-SM)”; about 90 % fine to medium sand; about 10 % nonplastic fines; dry, reddish-brown, strong reaction with HCl.

X2.4.3 *Broken Shells*—About 60 % gravel-size broken

shells; about 30 % sand and sand-size shell pieces; about 10 % fines; “Poorly Graded Gravel with Sand (GP).”

X2.4.4 *Crushed Rock*—Processed from gravel and cobbles in Pit No. 7; “Poorly Graded Gravel (GP)” ; about 90 % fine,

hard, angular gravel-size particles; about 10 % coarse, hard, angular sand-size particles; dry, tan; no reaction with HCl.

### **X3. SUGGESTED PROCEDURE FOR USING A BORDERLINE SYMBOL FOR SOILS WITH TWO POSSIBLE IDENTIFICATIONS.**

X3.1 Since this practice is based on estimates of particle size distribution and plasticity characteristics, it may be difficult to clearly identify the soil as belonging to one category. To indicate that the soil may fall into one of two possible basic groups, a borderline symbol may be used with the two symbols separated by a slash. For example: SC/CL or CL/CH.

X3.1.1 A borderline symbol may be used when the percentage of fines is estimated to be between 45 and 55 %. One symbol should be for a coarse-grained soil with fines and the other for a fine-grained soil. For example: GM/ML or CL/SC.

X3.1.2 A borderline symbol may be used when the percentage of sand and the percentage of gravel are estimated to be about the same. For example: GP/SP, SC/GC, GM/SM. It is practically impossible to have a soil that would have a borderline symbol of GW/SW.

X3.1.3 A borderline symbol may be used when the soil could be either well graded or poorly graded. For example: GW/GP, SW/SP.

X3.1.4 A borderline symbol may be used when the soil could either be a silt or a clay. For example: CL/ML, CH/MH, SC/SM.

X3.1.5 A borderline symbol may be used when a fine-grained soil has properties that indicate that it is at the boundary between a soil of low compressibility and a soil of high compressibility. For example: CL/CH, MH/ML.

X3.2 The order of the borderline symbols should reflect similarity to surrounding or adjacent soils. For example: soils in a borrow area have been identified as CH. One sample is considered to have a borderline symbol of CL and CH. To show similarity, the borderline symbol should be CH/CL.

X3.3 The group name for a soil with a borderline symbol should be the group name for the first symbol, except for:

CL/CH lean to fat clay

ML/CL clayey silt

CL/ML silty clay

X3.4 The use of a borderline symbol should not be used indiscriminately. Every effort shall be made to first place the soil into a single group.

### **X4. SUGGESTED PROCEDURES FOR ESTIMATING THE PERCENTAGES OF GRAVEL, SAND, AND FINES IN A SOIL SAMPLE**

X4.1 *Jar Method*—The relative percentage of coarse- and fine-grained material may be estimated by thoroughly shaking a mixture of soil and water in a test tube or jar, and then allowing the mixture to settle. The coarse particles will fall to the bottom and successively finer particles will be deposited with increasing time; the sand sizes will fall out of suspension in 20 to 30 s. The relative proportions can be estimated from the relative volume of each size separate. This method should be correlated to particle-size laboratory determinations.

X4.2 *Visual Method*—Mentally visualize the gravel size particles placed in a sack (or other container) or sacks. Then, do the same with the sand size particles and the fines. Then, mentally compare the number of sacks to estimate the percentage of plus No. 4 sieve size and minus No. 4 sieve size present.

The percentages of sand and fines in the minus sieve size No. 4 material can then be estimated from the wash test (X4.3).

X4.3 *Wash Test (for relative percentages of sand and fines)*—Select and moisten enough minus No. 4 sieve size material to form a 1-in (25-mm) cube of soil. Cut the cube in half, set one-half to the side, and place the other half in a small dish. Wash and decant the fines out of the material in the dish until the wash water is clear and then compare the two samples and estimate the percentage of sand and fines. Remember that the percentage is based on weight, not volume. However, the volume comparison will provide a reasonable indication of grain size percentages.

X4.3.1 While washing, it may be necessary to break down lumps of fines with the finger to get the correct percentages.

## X5. ABBREVIATED SOIL CLASSIFICATION SYMBOLS

X5.1 In some cases, because of lack of space, an abbreviated system may be useful to indicate the soil classification symbol and name. Examples of such cases would be graphical logs, databases, tables, etc.

X5.2 This abbreviated system is not a substitute for the full name and descriptive information but can be used in supplementary presentations when the complete description is referenced.

X5.3 The abbreviated system should consist of the soil classification symbol based on this standard with appropriate lower case letter prefixes and suffixes as:

Prefix:

Suffix:

s = sandy  
g = gravelly

s = with sand  
g = with gravel  
c = with cobbles  
b = with boulders

X5.4 The soil classification symbol is to be enclosed in parenthesis. Some examples would be:

*Group Symbol and Full Name*

*Abbreviated*

CL, Sandy lean clay  
SP-SM, Poorly graded sand with silt and gravel  
GP, poorly graded gravel with sand, cobbles, and boulders  
ML, gravelly silt with sand and cobbles

s(CL)  
(SP-SM)g  
(GP)scb  
g(ML)sc

## SUMMARY OF CHANGES

In accordance with Committee D18 policy, this section identifies the location of changes to this standard since the last edition (1993<sup>e1</sup>) that may impact the use of this standard.

(1) Added Practice D 3740 to Section 2.

(2) Added Note 5 under 5.7 and renumbered subsequent notes.

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STANDARD OPERATING  
PROCEDURE SL-07

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SUBSURFACE SOIL  
SAMPLING

## STANDARD OPERATING PROCEDURE (SOP) SL-07

### SUBSURFACE SOIL SAMPLING

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#### SCOPE AND APPLICATION

The following procedures are designed to be used to collect subsurface soil samples using a hand auger, direct-push drill rig, and a backhoe. *All underground utilities must be located and cleared prior to drilling or excavating.* Soil samples should be collected from areas having lower levels of constituents of interest first, followed by stations with higher expected levels of constituents of interest.

Based on field and site conditions, the procedures listed below may be modified in the field upon agreement of the field team leader and project management, after appropriate annotations have been made in the project-specific field logbook. If specialized sampling methods (e.g., Encore®) are to be used, refer to the manufacturer's recommended procedures. If methanol preservation is required, refer to Integral SOP SL-08 on methanol preservation of soil samples. Record all pertinent information in the Integral field logbook, subsurface soil field collection form, or boring log (as appropriate).

#### EQUIPMENT AND SUPPLIES REQUIRED

- Subsurface sampling equipment (e.g., hand auger, direct-push drill rig [e.g., Geoprobe®], backhoe, stainless-steel spade) (consult project-specific field sampling plan [FSP] for kind of equipment to be used for a specific field event)
- Large stainless steel mixing bowl and spoon
- Laboratory-supplied sample containers, insulated coolers, and ice
- Chain-of-custody forms, custody seals, sample labels
- Resealable plastic bags (e.g., Ziploc®)
- Camera
- Tape measure
- Logging table
- 6-mil visqueen and duct tape for covering the logging table
- Aluminum foil

- 55-gallon drums for decontamination waters and excess soil (separate drums for liquid and solid wastes) if required by the project-specific FSP
- Field logbook, subsurface soil field collection form, and/or soil boring form, and pens
- Project-specific FSP and health and safety plan (HSP)
- Personal protective equipment (PPE) (safety glasses, steel-toed boots, nitrile gloves, and any other items required by the project-specific HSP)
- Photoionization detector (PID), if required by the project-specific FSP or HSP
- Global positioning system (GPS), if required by the project-specific FSP
- Decontamination equipment.

## HAND AUGER SAMPLER

The following procedures are designed to be used during the general operation of a hand auger sampler. The procedures listed below may be modified in the field upon agreement of the field team leader and drill operators, based on field and site conditions, after appropriate annotations have been made in the field logbook.

1. Locate the sample station as directed in the project-specific FSP. Place sample labels on the sample container prior to filling in accordance with Integral's SOP on sample labeling (SOP AP-04).
2. Place plastic sheeting adjacent to the sampling location.
3. Advance the hand auger into subsurface soil.
4. Empty soil from the first interval (as specified in the project-specific FSP) from the hand auger into a decontaminated stainless steel bowl and cover the bowl with aluminum foil. Continue advancing the hand auger until the next appropriate sample interval has been completed.
5. Screen the soil sample for volatile organic compounds (VOCs) using a PID if required by the project-specific FSP.
6. Photograph each interval with depth and site markers visible in the photograph, if applicable.
7. Log the soils in accordance with SOP SL-04 (*Field Classification of Soils*).
8. If VOC samples are required (see project-specific FSP), collect them prior to homogenizing (i.e., mixing) the sample. Collect the VOC sample (with a minimum of disturbance) by placing the sample into the container with no headspace and sealing it tightly. If an Encore® sampling device is specified in the project-specific FSP, follow the sample collection guidelines provided by the manufacturer.

9. (a) If the soil sample is to be a discrete sample (see project-specific FSP), collect soil from the hand auger using a decontaminated stainless-steel spoon and place the sample into a decontaminated stainless-steel bowl. Homogenize the soil to a consistent color and texture.  
  
(b) If additional sample volume is required to perform the analyses specified in the project-specific FSP, place multiple soil samples collected from nearby locations (it is important to keep the distance between multiple soil borings as close as possible; the maximum distance will be specified in the project-specific FSP) from the same depth interval into a composite sample in a single decontaminated stainless-steel bowl. When a sufficient volume of soil has been obtained, homogenize all of the soil in the bowl to a consistent color and texture using a decontaminated spoon.
10. Discard rocks found in the homogenized soil that are greater than 0.5 in. in diameter after positively identifying them, determining their percentage contribution to the homogenized soil volume, and noting it in the field notebook.
11. Remove samples of the homogenized soil from the compositing bowl and place in the appropriate size sample container. Fill the sample container with soil to just below the container lip, and seal the container tightly.
12. Decontaminate all sampling equipment in accordance with SOP SL-01 and the project-specific FSP.
13. Repeat the process described above for all subsequent sample intervals.
14. Complete the appropriate field books, field data sheets, and quality assurance and quality control (QA/QC) documentation. Record any deviations from the specified sampling procedures or any obstacles encountered.
15. Backfill the borehole with remaining hand auger soil cuttings or place the cuttings in a properly labeled 55-gallon drum, as specified in the project-specific FSP. If soil cuttings are placed in a 55-gallon drum, backfill the borehole with bentonite hole plug pellets and hydrate the pellets with potable water.
16. Mark the sampling location with a wire flag, wooden stake, metal rebar, or flagging, as appropriate. Collect GPS coordinates of the sample location if specified in the project-specific FSP.

## **DIRECT-PUSH DRILL RIG**

The following procedures are designed to be used during the general operation of direct-push drill rig (e.g., Geoprobe®). The procedures listed below may be modified in the field upon agreement of the field team leader and drill operators, based on field and site conditions, after appropriate annotations have been made in the field logbook. The direct-push drill rig will be operated by a licensed drilling contractor.

The direct-push drilling technique hydraulically pushes tools into the ground to collect soil samples. Direct-push drilling techniques can be used to collect soil samples to depths of 30–100 ft, depending on drilling conditions at the site. In addition to soil sample collection, direct-push techniques can be used to collect soil gas samples, reconnoiter groundwater samples, and install small-diameter monitoring wells.

Soil samples can be collected using two types of Macrocore® samplers, open tip and closed tip. These samplers are typically either 4 ft long by 1.5 in. inside diameter (i.d.) or 5 ft long by 2.5 in. i.d. These samplers have a tubular design and utilize acetate liners to collect the soil samples. The following sections of this SOP describe how to collect soil samples using open-tip and closed-tip Macrocore® samplers.

## **Open-Tip Sampler**

The open-tip sampler is typically used in soils that are cohesive (e.g., stiff silts and clays), where the soil boring is stable and stays open when the sampler and rods are removed from the ground.

1. Ensure all underground utilities are cleared prior to initiating drilling activities.
2. Position the direct-push drill rig over the sample station and remove any surface material that will interfere with sampling. Note in the field logbook any surface material that is removed prior to sampling.
3. Determine the interval to be sampled and install a new clean liner into the open tip Macrocore® sampler.
4. Push the sampler to the bottom of the appropriate sample interval.
5. Retract the rods and Macrocore® sampler.
6. After the Macrocore® sampler has been brought to the surface, remove the liner from the sampler, cap both ends of the liner, and inspect it.
7. After the soil sample is judged to be acceptable, label the sample liner with the station identifier, depth interval, and soil orientation (i.e., arrow pointing toward uppermost soil interval).
8. Place the capped sample liner on a new piece of aluminum foil on the logging table and split the liner open with a hook or utility knife. Process the sample in accordance with the “General Sampling Procedures” listed below.
9. Repeat Steps 2–8 for each subsequent sample interval.

## Closed-Tip Sampler

The closed-tip sampler is typically used to collect soil samples that are noncohesive (e.g., sandy materials), where the soil boring is unstable and collapses when the rods and sampler are removed from the ground.

1. Ensure all underground utilities are cleared prior to initiating drilling activities.
2. Position the direct-push drill rig over the sample station and remove any surface material that will interfere with sampling. Note in the field logbook any surface material removed prior to sampling.
3. Determine the interval to be sampled and install a drive point and a new clean liner into the closed-tip Macrocore® sampler.
4. Push the rods and sampler to the top of the appropriate sample interval.
5. Retract the rods to release the drive point.
6. Push the sampler to the bottom of the appropriate sample interval.
7. Retract the rods and Macrocore® sampler.
8. Once the soil sample has been brought to the surface, remove the liner from the sampler, cap both ends of the liner, and inspect it.
9. After the soil sample is judged to be acceptable, label the sample liner with the station identifier, depth interval, and soil orientation (i.e., arrow pointing toward uppermost soil interval).
10. Place the capped sample liner on a new piece of aluminum foil on the logging table and split the liner open with a hook or utility knife. Process the sample in accordance with the “General Sampling Procedures” listed below.
11. Repeat Steps 2–10 for each additional sample interval.

## General Sampling Procedures

1. After the liner has been split open, screen the soil sample for VOCs using a PID if required by the project-specific FSP.
2. Log the soils in accordance with SOP SL-04 (*Field Classification of Soils*).
3. Photograph each section of the soil boring with appropriate orientation, depth, and site markers visible in the photograph, if specified in the project-specific FSP.

4. If VOC samples are required (see project-specific FSP), collect them prior to sample removal from the liner. Collect the VOC sample (with a minimum of disturbance) by placing the sample into the container with no headspace and seal it tightly. If an Encore® sampling device is specified in the project-specific FSP, follow the sample collection guidelines provided by the manufacturer.
5. Remove the soil from the liner using a decontaminated stainless-steel spoon and place the soil in a decontaminated compositing bowl and thoroughly mix and homogenize the sample using a decontaminated spoon until the color and texture are consistent throughout.
6. (a) If the soil sample is to be a discrete sample (see project-specific FSP), collect soil from the liner using a decontaminated stainless-steel spoon and place the sample into a decontaminated stainless-steel bowl. Homogenize the soil to a consistent color and texture.  
  
(b) If additional sample volume is required to perform the analyses specified in the project-specific FSP, place multiple soil samples collected from nearby locations (it is important to keep the distance between multiple soil borings as close as possible; the maximum distance will be specified in the project-specific FSP) from the same depth interval into a composite sample in a single decontaminated stainless-steel bowl. When a sufficient volume of soil has been obtained, homogenize all of the soil in the bowl to a consistent color and texture using a decontaminated spoon.
7. Discard rocks found in the homogenized soil that are greater than 0.5 in. in diameter after positively identifying them, determining their percentage contribution to the homogenized soil volume, and noting it in the field notebook.
8. Remove samples of the homogenized soil from the compositing bowl and place in the appropriate size sample container. Fill the sample container with soil to just below the container lip, and seal the container tightly.
9. Repeat the process described above for subsequent sample intervals.
10. Complete the appropriate field books, field data sheets, and QA/QC documentation. Record any deviations from the specified sampling procedures or any obstacles encountered.
11. Backfill the borehole with remaining direct-push sampler cuttings or place the cuttings in a properly labeled 55-gallon drum, as specified in the project-specific FSP. If soil cuttings are placed in a 55-gallon drum, backfill the borehole with bentonite grout (mixed to the manufacturer's specifications) or bentonite hole plug pellets and hydrate the pellets with potable water.
12. Mark the sampling location with a wire flag, wooden stake, metal rebar, or flagging, as appropriate. Collect GPS coordinates of the sample location if specified in the project-specific FSP.

13. Decontaminate all sampling equipment in accordance with SOP SL-01 and the project-specific FSP.

## Test Pit Excavations

The following procedures are to be used during the excavation of pits with construction equipment (i.e., backhoe or track-hoe) prior to soil sampling operations. Adhere to all requirements of the site-specific HSP for this specific activity. The procedures listed below may be modified in the field upon agreement of the field team leader and project management, based on field and site conditions, after appropriate annotations have been made in the field logbook.

1. Locate the sample station as directed in the project-specific FSP. Ensure all underground utilities have been cleared prior to initiating excavation activities. Place sample labels on all sample containers prior to filling in accordance with Integral's SOP for sample labeling (SOP AP-04).
2. Select the appropriate orientation for the excavation, basing it on the judgment of the field team leader, backhoe operator, and onsite conditions. Sampling personnel **MUST** remain in visual contact with the backhoe operator at all times, and out of possible "pinch zones" or areas where heavy equipment may move or swing.
3. Place plastic sheeting from the edge of the proposed excavation leading away for a sufficient distance to the proposed temporary stockpile location so that the excavated soil does not slough back into the pit.
4. Begin pit excavation.
5. Continue excavation of the pit to the required depth. If pit entry is necessary, this depth will not exceed 4 ft from the ground surface. Never enter a trench or pit if conditions are unstable. Excavate the proper pit exit trenches, shoring, and sloping to prevent accidental burial of sampling crew, and to meet or exceed all OSHA Construction Standards (29 CFR § 1926; Attachment 201-2) for entrance by sampling personnel. If pit entry is not necessary for sampling activities, pit depth can exceed 4 ft below ground surface. Instruct the backhoe operator to scrape material evenly along an exposed face to collect (to the extent practicable) a representative sample of the soils across the entire face in the bucket. Collect soil samples from the middle of the backhoe bucket.
6. Screen the soil sample for VOCs using a PID if required by the project-specific FSP.
7. Photograph each interval with depth and site markers visible in the photograph, if applicable.
8. Log the test pit soils in accordance with SOP SL-04 (*Field Classification of Soils*).



9. If VOC samples are required (see project-specific FSP), collect them prior to homogenizing (i.e., mixing) the sample. Collect the VOC sample (with a minimum of disturbance) by placing the sample into the container with no headspace and seal it tightly. If an Encore® sampling device is specified in the project-specific FSP, follow the sample collection guidelines provided by the manufacturer.
10. Collect soil using a decontaminated stainless-steel spoon or disposable sampling tool (depending on project-specific requirements; see FSP), which has been evenly removed from the face of the trench wall or from the bucket, and place the sample into a decontaminated stainless-steel bowl. Homogenize the soil to a consistent color and texture.
11. Discard rocks found in the homogenized soil that are greater than 0.5 in. in diameter after positively identifying them, determining their percentage contribution to the homogenized soil volume, and noting it in the field notebook.
12. Remove samples of the homogenized soil from the compositing bowl and place them in the appropriate size sample container. Fill the sample container with soil to just below the container lip and seal it tightly.
13. Decontaminate all sampling equipment in accordance with SOP SL-01 and the project-specific FSP.
14. Repeat the process described above for all subsequent sample intervals.
15. Complete all pertinent field logbooks, field data sheets, and QA/QC documentation. Record any deviations from the specified sampling procedures or any obstacles encountered.
16. Mark the sampling location with a wire flag, wooden stake, metal rebar, or flagging, as appropriate. Collect GPS coordinates of the sample location if specified in the project-specific FSP. Photograph sample location and document in the logbook.
17. Backfill the test pit with the excavated soils. Depending on historical site data (see project-specific FSP), the plastic sheeting will either be disposed of as garbage or it will be drummed and sent to a hazardous waste landfill.

# ATTACHMENT A2 ADDENDUM 4 TO THE OVERALL HEALTH AND SAFETY PLAN: SOIL SAMPLING HEALTH AND SAFETY PLAN

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**Prepared for**

International Paper Company

**Prepared by**

Integral Consulting Inc.

411 First Avenue South, Suite 550

Seattle, Washington 98104

**March 2011**

## **CERTIFICATION PAGE**

Addendum 4 to the overall health and safety plan (HASP; Anchor QEA 2009) for the San Jacinto River Waste Pits Superfund Site (the Site) has been reviewed and approved by Integral Consulting Inc. (Integral) for the 2010 soil study at the Site in support of the remedial investigation and feasibility study (RI/FS) for the Site.

---

Jennifer Sampson  
Project Manager  
Integral Consulting Inc.

---

Bill Lawrence  
Field Lead  
Integral Consulting Inc.

Date: \_\_\_\_\_

Date: \_\_\_\_\_

## HEALTH AND SAFETY PLAN ACKNOWLEDGEMENT FORM

Project Name: San Jacinto River Waste Pits Superfund Site

Addendum 4 to the overall HASP (Anchor QEA 2009) is approved by Integral for use at the San Jacinto River Waste Pits Superfund Site (the Site). The overall HASP and Addendum 4 are the minimum health and safety standard for the Site and will be strictly enforced for Integral personnel and other consulting personnel including subcontractors where applicable.

I have reviewed Addendum 4, dated March 2011, to the overall HASP for the 2010 soil study. I have had an opportunity to ask any questions I may have and have been provided with satisfactory responses. I understand the purpose of the plan, and I consent to adhere to its policies, procedures, and guidelines while an employee of Integral, or its subcontractors.

Date	Name (print)	Signature	Company

Date	Name (print)	Signature	Company

## SITE EMERGENCY PROCEDURES

### Emergency Contact Information

**Table A**  
**Site Emergency Form and Emergency Phone Numbers**

Category	Information
Chemicals of Potential Concern	Dioxins/furans, aluminum, magnesium, mercury, and copper
Minimum Level of Protection	Level D
Site(s) Location Address	(No formal address, see Figure A) Channelview, TX 77530 Coordinates [29° 47' 38.49"N, 95° 3' 49.55"W]
<b>Emergency Phone Numbers</b>	
Ambulance	911
Fire	911
Police	911
Poison Control	911 and then 1-800-222-1212 if appropriate
<b>Project-Specific Health and Safety Officers' Phone Numbers</b>	
Integral Field Lead (FL) and Integral Site Safety Officer (SSO)	Bill Lawrence Office: (206) 230-9600 Cell: (253) 691-2216
Integral Corporate Health and Safety Manager (CHSM)	Eron Dodak Office: (503) 284-5545 ext. 14 Cell: (503) 407-2933
Integral Project Manager (PM)	Jennifer Sampson Office: (206) 957-0351 Cell: (360) 286-7552
Anchor QEA PM	David Keith Office: (228) 818-9626 Cell: (228) 224-2983
Anchor QEA FL and SSO	Chris Torell Office: (315) 453-9009 ext. 17 Cell: (315) 254-4954
Anchor QEA CHSM	David Templeton Office: (206) 287-9130 Cell: (206) 910-4279
Client Contract – International Paper Company (IPC)	Phil Slowiak Office: (901) 419-3845 Cell: (901) 214-9550
<b>Reporting Oil and Chemical Spills</b>	
National Response Center	1-800-424-8802
State Emergency Response System	(512) 424-2138
EPA Environmental Response Team	(201) 321-6600

Note: In the event of any emergency, contact both the Integral and Anchor QEA PMs and FLs.

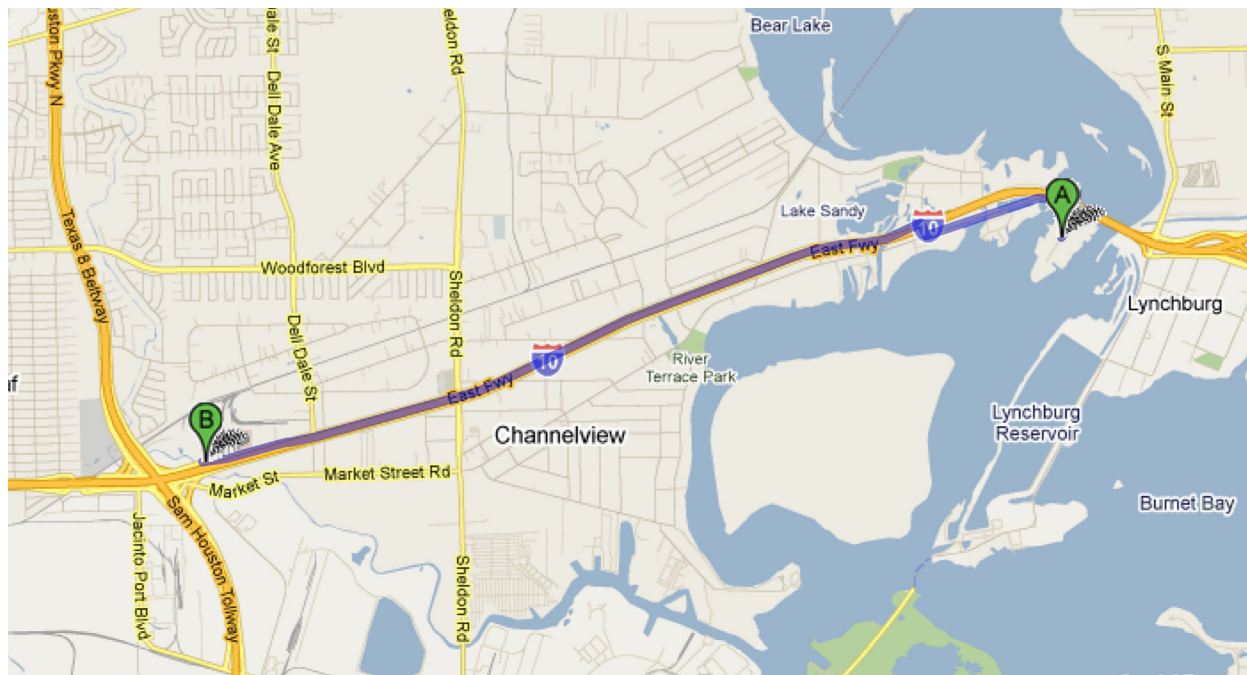
**Figure A**  
**Site Location Map**



**Table B**  
**Hospital Information**

Category	Information
Hospital Name	Triumph Hospital – East Houston
Address	15101 East Freeway
City, State	Channelview, TX 77530-41041
Phone	(713) 691-6556
Emergency Phone	(713) 691-6556

**Figure B**  
**Hospital Route Map**



### **DRIVING DIRECTIONS FROM SITE TO HOSPITAL**

1. Head west on Market Street toward Market Street Road (approximately 1.1 mile).
2. Take the first right onto Monmouth Street.
3. Take the first left onto East Freeway Service Road.
4. Take the ramp on the left to I-10 West.
5. Proceed on I-10 West to Exit 781B (approximately 3.7 miles).
6. Exit freeway at Exit 781B onto East Freeway Service Road.
7. Continue heading west on East Freeway Service Road (approximately 0.2 mile).
8. Triumph Hospital will be on the right (total distance approximately 5 miles).



**Figure C**  
**Hospital Detail (Egress from I-10 West)**



## **Emergency Response Procedures**

**In the event of an emergency, refer to the procedures in the San Jacinto River Waste Pits Superfund Site Overall HASP (Anchor QEA 2009).**

A copy of this Addendum must be included with the overall HASP, and both copies must be available in the field at all times during field work.

Other health and safety considerations for this sampling effort are addressed in Addendum 3 to the overall HASP, included as an attachment to the main Soil SAP. Additions to Section 2 detailing the area-specific scope of work are provided below.

## 2 SCOPE OF WORK

Soil samples will be collected from Area 4 (see Figure A-2 Field Sampling Plan [FSP] Addendum):

- Area 4. The upland area of the peninsula south of I-10.

The sampling design can be summarized as follows:

- **Area 4:** Two types of soil samples will be collected:
  - Surface and shallow subsurface soil sampling and analysis of chemicals of interest (COIs) at 4 locations from Area 4, in the uplands of the peninsula south of I-10 (stations SJTS032 through SJTS035; Figure A-2 of the FSP Addendum), to support evaluation of nature and extent of contamination, risk assessments, and development of the conceptual site model. Surface and subsurface soil samples will be collected at all 4 stations at depths of 0 to 6 inch (0 to 15 cm) and 6 to 12 inches (15 to 30 cm); all samples will be analyzed for COIs, total organic carbon (TOC), and grain size.
  - Soil cores at 7 locations from Area 4, in the western half of the peninsula south of I-10 (stations SJSB001 through SJSB007; Figure A-2 of the FSP Addendum), to support evaluation of nature and extent of contamination and development of the conceptual site model. Surface and subsurface soil samples will be collected at all core locations at depths of 0 to 6 inch (0 to 15 cm) and 6 to 12 inches (15 to 30 cm); a deep subsurface increment 12 to 24 inches (30 to 60 cm) will also be collected. The cores will be advanced until native fluvial deposits are reached (14-foot maximum) and every 2-foot interval will be sampled starting at 24 inches bgs to the maximum depth. All surface and subsurface samples will be analyzed for COIs, TOC, and grain size.

The surface and subsurface soil samples will be collected using a stainless-steel shovel, trowel, spoon, hand auger, or hand corer. Soil borings will be installed using a truck-mounted AMS power probe™ or a similar sampling device (e.g., Geoprobe™).

ATTACHMENT A3

---

FIELD FORMS



411 1st Avenue S, Suite 550  
Seattle, WA 98104

(206) 230-9600 FAX (206) 230-9601

BORING ID \_\_\_\_\_  
PROJECT \_\_\_\_\_  
LOCATION \_\_\_\_\_  
PROJECT NUMBER \_\_\_\_\_  
LOGGED BY \_\_\_\_\_

North ↑

Page \_\_\_\_ of \_\_\_\_

SAMPLE INFORMATION							STRATA	DESCRIPTION	
Sample ID	Photo No.	% Recov.	PID	FID	Sheen	Depth Feet		USCS group name, color, grain size range, minor constituents, plasticity, odor, sheen, moisture content, texture, weathering, cementation, geologic interpretation, etc.	
						1--			
						2--			
						3--			
						4--			
						5--			
						6--			
						7--			
						8--			
						9--			
						10--			
						11--			
						12--			
						13--			
						14--			
						15--			
						16--			
						17--			

DRILLING CONTRACTOR \_\_\_\_\_  
DILLING METHOD \_\_\_\_\_  
SAMPLING EQUIPMENT \_\_\_\_\_  
DRILLING STARTED \_\_\_\_\_

COORDINATES \_\_\_\_\_  
SURFACE ELEVATION \_\_\_\_\_  
CASING ELEVATION \_\_\_\_\_  
DATUM \_\_\_\_\_

## ATTACHMENT A4

USEPA RISK ASSESSMENT  
GUIDANCE FORMS (PER  
THE UNILATERAL  
ADMINISTRATIVE ORDER  
STATEMENT OF WORK)

## EXHIBIT 5

---

# USEPA SAMPLING DESIGN SELECTION WORKSHEETS

## Exhibit 5. Part I: Medium Sampling Summary

### Sampling Design Selection Worksheet

A. Site Name San Jacinto River Waste Pits

B. Base Map Code \_\_\_\_\_

C. Medium: Groundwater, Soil, Sediment,  
Surface Water, Air or Other (specify)

Soil

D. Comments Only the surface intervals (0-6 inches and 6-12 inches) associated with the samples collected in Areas 4a and 4b are included on this form, because the final achievable depth and total number of samples is currently unknown. These surface intervals will be analyzed for COIs, TOC, and grain size.

E. Medium/ Pathway Code	Exposure Pathway/ Exposure Area Name	F. Number of Samples from Part II					
		Judgmental/ Purposive	Background	Statistical Design	Geometrical or Geostatistical Design	QC	Row Total
Soil	Nature and extent, exposure assessments, contaminant fate and transport	20	NA	NA	NA	5	25
Column Totals:		20	NA	NA	NA	5	25
G. Grand Total:							25



**Exhibit 5. Part II: Exposure Pathway Summary**  
**Sampling Design Selection Worksheet (cont'd.)**

H. Radionuclide of Potential Concern and CAS Number	I. Frequency of Occurrence	J. Estimation		K. CV	L. Background
		Arithmetic Mean	Maximum		
NA	NA	NA	NA	NA	NA

**M. Code (CAS Number) of Radionuclide of Potential Concern Selected as Proxy** NA

**N. Reason for Defining New Stratum or Domain (check one)**

- ☐ Heterogeneous Radionuclide Distribution  
☐ Geological Stratum Controls  
☐ Historical Information Indicates Difference  
☐ Field Screening Indicates Difference  
☐ Exposure Variations  
☒ Other (specify) NA

Q. Stratum or Exposure Area	P. Reason	Q. Number of Samples from Part III					
		Judgmental/ Purposive	Background	Statistical Design	Geometrical or Geostatistical Design	QC	Row Total
Soil	Nature and extent, exposure assessments, contaminant fate and transport	20	NA	NA	NA	5	25
<b>R. Total (Part I, Step F):</b>			NA	NA	NA	5	25

## Exhibit 5. Part III: Exposure Area Summary

### Sampling Design Selection Worksheet (cont'd.)

O. Stratum or Exposure Area San Jacinto River Waste Pits Domain Code \_\_\_\_\_  
 E. Medium/Pathway Code Soil Pathway Code \_\_\_\_\_

#### S. Judgmental or Purposive Sampling

##### Comments

Use prior site information to place samples, or determine location and extent of contamination. Judgmental or purposive samples generally cannot be used to replace statistically located samples. An exposure area and stratum MUST be sampled by at least TWO samples.

##### Number of Samples

25

#### T. Background Samples

Background samples must be taken for each medium relevant to each stratum/area. Zero background samples are not acceptable. See the discussion on pp. 74-75 of Guidance for Data Useability in Risk Assessment Part A.

##### Number of Background Samples

NA

#### U. Statistical Samples

CV of proxy or radionuclide of potential concern

NA

Minimum Detectable Relative Difference (MDRD)

NA

(<40% if no other information exists)

Confidence Level NA (>80%)

Power of Test

NA (>90%)

##### Number of Samples (See formula in Appendix IV)

NA

#### V. Geometrical Samples

Hot spot radius

NA

Enter distance units)

NA

Probability of hot spot prior to investigation

NA

(0 to 100%)

Probability that NO hot spot exists after investigation  
(See formula in Appendix IV)

NA

(enter only if >75%)

#### W. Geostatistical Samples

Required number of samples to complete grid + number of short range samples

NA

#### X. Quality Control samples

Number of Duplicates (Minimum 1:20 environmental samples)

5

Number of Blanks (Minimum 1 per medium or 1 per sampling process, whichever is greater)

5 (max)

#### Y. Sample Total for Stratum (Part II, Step U)

Judgmental/ Purposive	Background	Statistical Design	Geometrical or Geostatistical Design	QC	Row Total
20	NA	NA	NA	5	25

EXHIBIT 52

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METHOD SELECTION  
WORKSHEET

## Exhibit 52. Method Selection Worksheet

I. Analytes		II. Medium	III. Critical parameters				IV. Routine Available Methods <sup>4</sup>
A. Chemical or Class of Chemicals of Potential Concern	B. Reporting Requirement <sup>1</sup> (Y/N)		A. Turnaround Time (enter hours or days)	B. ID Only or ID Plus Quant (ID or ID+Q)	C. Concentration of Concern (or PRG) <sup>2</sup>	D. Required Method Detection Limit <sup>3</sup>	
Dioxins/furans	N	Soil	21 days	ID+Q	2,3,7,8-TCDD TEQ of 17 ng/kg	Not applicable	1613B
Aluminum	N	Soil	21 days	ID+Q	990,000 mg/kg	198,000 mg/kg	6010B / 6020
Antimony	N	Soil	21 days	ID+Q	410 mg/kg	82 mg/kg	6010B / 6020
Arsenic	N	Soil	21 days	ID+Q	1.6 mg/kg	0.32 mg/kg	6010B / 6020
Barium	N	Soil	21 days	ID+Q	190,000 mg/kg	38,000 mg/kg	6010B / 6020
Cadmium	N	Soil	21 days	ID+Q	800 mg/kg	160 mg/kg	6010B / 6020
Chromium	N	Soil	21 days	ID+Q	1,500,000 mg/kg	300,000 mg/kg	6010B / 6020
Cobalt	N	Soil	21 days	ID+Q	300 mg/kg	60 mg/kg	6010B / 6020
Copper	N	Soil	21 days	ID+Q	41,000 mg/kg	8,200 mg/kg	6010B / 6020
Lead	N	Soil	21 days	ID+Q	800 mg/kg	160 mg/kg	6010B / 6020
Magnesium	N	Soil	21 days	ID+Q	No value	Not applicable	6010B / 6020
Manganese	N	Soil	21 days	ID+Q	23,000 mg/kg	4,600 mg/kg	6010B / 6020
Nickel	N	Soil	21 days	ID+Q	20,000 mg/kg	4,000 mg/kg	6010B / 6020
Silver	N	Soil	21 days	ID+Q	5,100mg/kg	1020 mg/kg	6010B / 6020
Thallium	N	Soil	21 days	ID+Q	78 mg/kg	15.6 mg/kg	6010B / 6020
Vanadium	N	Soil	21 days	ID+Q	72 mg/kg	14.4 mg/kg	6010B / 6020
Zinc	N	Soil	21 days	ID+Q	310,000 mg/kg	62,000 mg/kg	6010B / 6020
Mercury	N	Soil	21 days	ID+Q	34 mg/kg	6.8 mg/kg	7471A
PCB 77	N	Soil	21 days	ID+Q	110 µg/kg	22 µg/kg	1668A

I. Analytes		II. Medium	III. Critical parameters				IV. Routine Available Methods <sup>4</sup>
A. Chemical or Class of Chemicals of Potential Concern	B. Reporting Requirement <sup>1</sup> (Y/N)		A. Turnaround Time (enter hours or days)	B. ID Only or ID Plus Quant (ID or ID+Q)	C. Concentration of Concern (or PRG) <sup>2</sup>	D. Required Method Detection Limit <sup>3</sup>	
PCB 81	N	Soil	21 days	ID+Q	110 µg/kg	22 µg/kg	1668A
PCB 105	N	Soil	21 days	ID+Q	110 µg/kg	22 µg/kg	1668A
PCB 114	N	Soil	21 days	ID+Q	2.3 µg/kg	0.46 µg/kg	1668A
PCB 118	N	Soil	21 days	ID+Q	110 µg/kg	22 µg/kg	1668A
PCB 123	N	Soil	21 days	ID+Q	110 µg/kg	22 µg/kg	1668A
PCB 126	N	Soil	21 days	ID+Q	110 µg/kg	22 µg/kg	1668A
PCB 156	N	Soil	21 days	ID+Q	230 µg/kg	46 µg/kg	1668A
PCB 157	N	Soil	21 days	ID+Q	230 µg/kg	46 µg/kg	1668A
PCB 167	N	Soil	21 days	ID+Q	1,100 µg/kg	220 µg/kg	1668A
PCB 169	N	Soil	21 days	ID+Q	1.1 µg/kg	0.22 µg/kg	1668A
PCB 189	N	Soil	21 days	ID+Q	110 µg/kg	22 µg/kg	1668A
Total PCBs	N	Soil	21 days	ID+Q	220 µg/kg	44 µg/kg	8082 / 1668A
Acenaphthene	N	Soil	21 days	ID+Q	33,000,000 µg/kg	6,600,000µg/kg	8270C
Fluorene	N	Soil	21 days	ID+Q	22,000,000 µg/kg	4,400,000µg/kg	8270C
Naphthalene	N	Soil	21 days	ID+Q	18,000 µg/kg	3,600 µg/kg	8270C
Phenanthrene	N	Soil	21 days	ID+Q	19,000,000 µg/kg	3,800,000 µg/kg	8270C
2,4,6-Trichlorophenol	N	Soil	21 days	ID+Q	160,000 µg/kg	32,000 µg/kg	8270C
2,4-Dichlorophenol	N	Soil	21 days	ID+Q	180,000 µg/kg	36,000 µg/kg	8270C
Pentachlorophenol	N	Soil	21 days	ID+Q	9,000 µg/kg	1,800 µg/kg	8270C
Phenol	N	Soil	21 days	ID+Q	180,000,000 µg/kg	36,000,000 µg/kg	8270C
Hexachlorobenzene	N	Soil	21 days	ID+Q	1,100 µg/kg	220 µg/kg	8270C
2,3,4,6-Tetrachlorophenol	N	Soil	21 days	ID+Q	18,000,000 µg/kg	3,600,000 µg/kg	8270C

I. Analytes		II. Medium	III. Critical parameters				IV. Routine Available Methods <sup>4</sup>
A. Chemical or Class of Chemicals of Potential Concern	B. Reporting Requirement <sup>1</sup> (Y/N)		A. Turnaround Time (enter hours or days)	B. ID Only or ID Plus Quant (ID or ID+Q)	C. Concentration of Concern (or PRG) <sup>2</sup>	D. Required Method Detection Limit <sup>3</sup>	
Carbazole	N	Soil	21 days	ID+Q	950,000 µg/kg	190,000 µg/kg	8270C
2,4,5-Trichlorophenol	N	Soil	21 days	ID+Q	62,000,000 µg/kg	12,400,000 µg/kg	8270C
Bis(2-ethylhexyl) phthalate	N	Soil	21 days	ID+Q	120,000 µg/kg	24,000 µg/kg	8270C
Chloroform	N	Soil	21 days	ID+Q	1,500 µg/kg	300 µg/kg	8260B
1,2,4-Trichlorobenzene	N	Soil	21 days	ID+Q	270,000 µg/kg	54,000 µg/kg	8260B
1,2-Dichlorobenzene	N	Soil	21 days	ID+Q	9,800,000 µg/kg	1,960,000 µg/kg	8260B
1,3-Dichlorobenzene	N	Soil	21 days	ID+Q	88,000 µg/kg	17,600 µg/kg	8260B
1,4-Dichlorobenzene	N	Soil	21 days	ID+Q	12,000 µg/kg	2,400 µg/kg	8260B
1,2,3-Trichlorobenzene	N	Soil	21 days	ID+Q	490,000 µg/kg	98,000 µg/kg	8260B

<sup>1</sup>Y = total reported for compound class

N = each analyte reported separately

<sup>2</sup>Preliminary remediation goal

<sup>3</sup>Method detection limit should be no greater than 20% of concentration of concern

<sup>4</sup>Refer to Appendix III for specific methods. Recommend consultation with chemist and/or automated methods search to determine all methods available. (Exhibit 53 lists computer systems that support method selection.

APPENDIX B  
AREA 4 HISTORICAL DOCUMENTS,  
HISTORICAL AERIAL IMAGES, AND LIDAR  
DATA  
SAN JACINTO RIVER WASTE PITS  
SUPERFUND SITE

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SDMS # 862018  
P 4905 148-150

# McGuinness Industrial Maintenance Corporation

WPER

201 NORTH WICKEY - PASADENA, TEXAS 77502 - GR 3-9587



July 21, 1966

Texas Water Pollution Control Board  
1100 West 49th Street  
Austin, Texas 78750

Attn: Mr. Hugh C. Yantis, Assistant Executive Secretary

Gentlemen:

In line with our recent discussion, permission is hereby requested for the release of a combination of stabilized waste water and rain water accumulated in a holding pond adjacent to Old River and Interstate Highway 10.


Attached is a tabulation showing the characteristics of the water to be released and a map giving the location of the pond.

The owner of the property has requested the early return of this facility for his own use and we need to take advantage of the hot summer months for maximum drying of the contents.

Your early consideration of this request will be appreciated.

Yours very truly,

MCGUINNESS-INDUSTRIAL MAINTENANCE CORP.

  
V. C. MCGUINNESS  
Vice-President

VCM:bgt  
Enclosures

MIMC - 000107

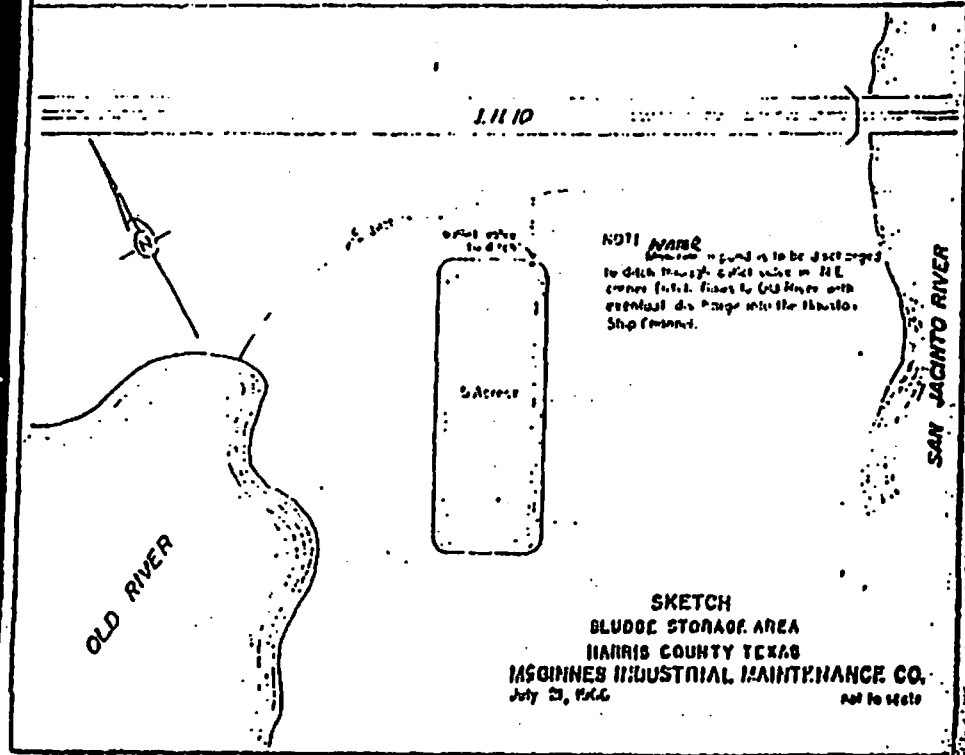
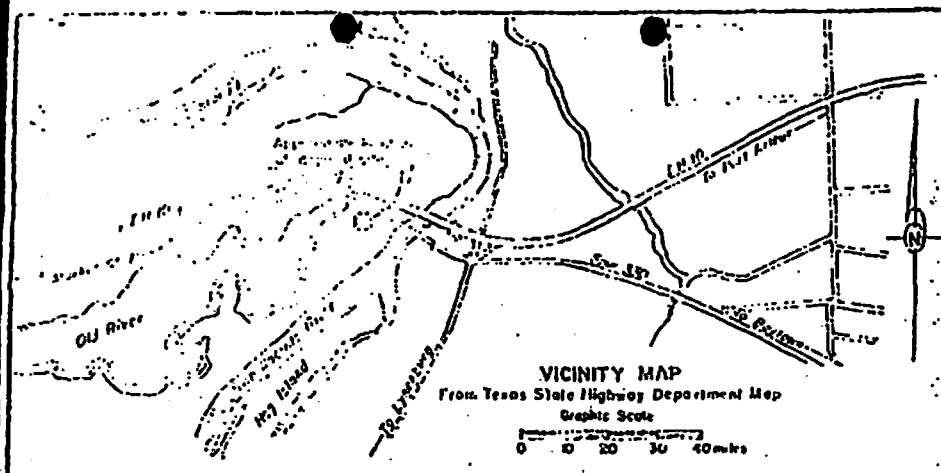


**CHARACTERISTICS OF WASTE WATER  
ORIGINAL DISPOSAL SITE  
South of Highway 10**

<u>Characteristic</u>	<u>12-29-65</u>	<u>4-22-66</u>	<u>State Test 4-22-66</u>	<u>5-25-66</u>	<u>6-29-66</u>	<u>Zone I Objective</u>
pH	7.9	8.2	8.3	7.7	7.3	4.5 - 10.5
BOD, ppm	79	< 14	8	33	13	30
Chloride, ppm	1056	2070	2050	1664	1735	-
Alkalinity, ppm	802	-	-	-	525	-
Dissolved Oxygen, ppm	0.4	7.8	2.2*	0.3	6.3	-
Total Suspended Solids, ppm	114	36	20	140	50	165
Volatile Suspended Solids, ppm	-	30	13	-	44	52
Dissolved Solids, ppm	-	4224	4371	3364	4232	-
Sulfate, ppm	-	54	50	43	43	-
COD, ppm	-	196	-	-	283	320
Color, ppm	-	65	110	138	150	-
Temperature, °F					94	

Disposal operations terminated at this location about September 14, 1965.

\*Sample not fixed in field at time of collection.



50 MS 17 26 20 18  
Fugor 172-144

U.S. AIRL. DEPARTMENT OF HEALTH  
AUSTIN TEXAS  
INTER-OFFICE  
FROM Stanley E. Thompson, P.E., Regional Engineer  
TO R.F. Scallhorst, P.E., District Engineer  
Division of Water Pollution Control  
SUBJECT: Investigation of Industrial Waste Disposal - Champion Paper, Inc., Pasadena, Texas

Following a request from Hugh Yantis, Assistant Executive Secretary of the Water Pollution Control Board, the writer and Sanitarian John Kidd contacted officials of the Champion Paper, Inc., Pasadena, Texas, and made an investigation of the present waste disposal practices of the company. This investigation was made on April 22, 1966.

Persons contacted during the course of the investigation included:

Mr. J.L. Henderson	-	Champion Paper	
Mr. A.J. Kavarre	-	"	
Mr. V.C. McGinnis	-	McGinnis Industrial Paint Corp.	(Secy-Treas)
Mr. George Laurie	-	"	(Gen. Manager)
A.E. Kimball	-	"	"

The mailing addresses of the companies are:

Champion Papers, Inc., P.O. Box 872, Pasadena, Texas 77501

McGinnis Ind. Paint Corp., 201 N. Midway, Pasadena, Tex 77502

In addition to the above, Sanitarian Bob Douglas of the Harris County Health Department, Air and Stream Pollution Section, was contacted in the absence of Mr. W.A. Ouedekaux, Chief of the Section. Mr. Douglas was unable to assist in the inspection.

#### General

The investigation covered the present practice of disposal of settled solids from the Champion Paper processes, a practice which is carried out by the McGinnis Ind. Paint Corp. This practice consists of the removal of the settled material from the secondary ponds at Champion plant, the transporting of the material by barge to an area adjacent to the San Jacinto River (near Hwy. 21), and the unloading from the barge into ponds which have been served by McGinnis. This operation has been carried out since approximately 1965. In June of 1965, this work was done by the Office of Construction Co., with the McGinnis Corp. taking over and beginning operation on September 13, 1965.

This particular type of operation is carried out in a cycle of sorts. The ponds at Champion are allowed to fill with the material (or one full and the other approaching it) and hauling is then begun on the full pit. At the time of the inspection, both pits had been cleaned with about 5 barge loads (est. by Mr. McGinnis) left to remove. This would complete the operation until the ponds are again full - which is expected to be sometime later this year.

SIGNED \_\_\_\_\_

MIMC - 000101

#### Quality of Material Removed

An analysis of the material was not available, but officials of Champion indicated that the material was neutral in pH, non-toxic, and primarily fibrous. The dried material resembled a cheaper grade of cardboard - such as used in egg cartons, etc. Mr. McGinnis reported that he had used it successfully for culling for his equipment in the disposal site.

The material appears to solidify rapidly and Mr. Henderson reported that a vertical wall can be cut in the ponds while removing it and that the wall will stand. It was also reported that after the material has set a short time, that water will not penetrate it - that rain water will stand over it. It was further reported that grass can be started on the dry material and that it will spread rapidly, thus further cutting off water.

The material is removed by use of jetting (using waste water from the third set of ponds) and is reported to be removed with a solid content of 25% to 30%.

#### Quantity of Material

It was estimated by Mr. Henderson that complete cleaning of the two ponds would result in removal of about 135,000 cubic yards of the material. The barges used in the operation will hold about 1,000 yards and three barges are used. This allows one barge to be in the process of being filled, one to be in the process of being unloaded, and one to be in transit. About 6 hours is required for the complete operation. Two shifts have been in operation to allow an average of 6 barge loads per day to be hauled.

Mr. Henderson stated that the material was accumulating at Champion at an estimated rate of 1 barge load per day.

#### Disposal Site

As mentioned, the disposal site is adjacent to the San Jacinto River at the Hwy 73 Bridge with the older site on the south side of the Highway and the newer site on the North side. The older site was used prior to McGinnis Corp. taking over the operation and appears to consist of a pond covering between 15 and 20 acres. The new (and present) site consists of an estimated 20+ acres, of which slightly less than 15 are being used. This area contains two ponds.

One of the ponds has been filled and the second is nearly full. Levees on the first pond appear to be in good shape, with possibly slight seepage, while the second pond needs additional work on the levees. According to Mr. McGinnis, wet weather has prohibited the proper completion of the levees and additional work is to be done as soon as possible.

The two new ponds are connected with a drain line to allow the flow of excess water (including rain water) from pond #1 to pond #2, where it collects near the barge unloading area. At the present time, this water is pumped back into the barges and returned to the Champion Paper plant where it is passed through the last settling ponds and discharged to the Channel with the rest of the plant effluent. This particular operation will be mentioned later in the report.

#### Water to River

According to available information, the river is not subject to flooding which might wash out the levees - that is, subject to flooding from rainfall without the aid of a storm such as Orin. In that event, the disposal area might well be covered with water.

It also appears that the material will solidify after being in the ponds a short time and there would be no danger of pollution from seepage. The only water is that which does seep out from the solid material and rainfall.

#### Excess Water & Its Disposal

At the present time, the excess water plus rainfall which collects in the pond area is pumped into the barges and is carried back to Chaplain Paper and discharged through the sludge settling ponds. According to Mr. Henderson and Mr. McInnes, this operation is not economical and they are very interested in finding out if the water could be discharged into the river at the disposal site. The main trouble in the removal of water being that the solidification of the material and the draining of the top water would allow the discharge of more wastes to the area.

An example of this is the older area (South of the Hwy), where the water ranges from 3 - 5 feet deep. Mr. Kintall had a minnow bucket type of container submerged in this water with fish in it and reported that they had been there for several weeks. These fish (or minnows) were in good condition.

#### Quality of Excess Water

Samples were collected of the water in the various pits and submitted to the Austin State Dept of Health Laboratory for analysis. The samples and their results are as follows:

<u>Point of coll</u>	<u>pH</u>	<u>BOD</u>	<u>Sulphates</u>	<u>Chlorides</u>	<u>S.S</u>	<u>D.O.</u>	<u>Color</u>
#1 - New Pond #2 - near pt of return to large	7.8	1590	5	790	213	0	220
#2 - New Pond #1	7.4	> 2,500	31	1,170	224	0	110
#3 - San Jacinto River - near barging pt	7.3	2.5	78	1,665	36	4.4	.
#4 - Old Pond - South of Hwy 73	8.3	8.0	50	2060	70	2.2	110

In general appearance, samples #1 and #2 were very dark with #1 somewhat lighter. The water from the older pond (Sample #4) had been undisturbed for over 6 to 7 months.

Enclosure

Officials of both companies were most anxious to work something out regarding this method of waste disposal. It appears that several things are to be considered in the matter.

1. The type of waste involved is not easy to get rid of, there is a large amount of the waste, and there will be an even larger amount in the future. This larger amount will be due to the new, and more efficient, waste treatment equipment that is to be provided by Champion Paper.
2. Very large tracts of land would be required for extended operation of this type, and this land would need to be accessible to barges - so on major rivers or streams. Apparently, the company officials feel that they can return to the barge after a period of time and deposit additional material. This would be necessary to get the full benefit from the land.
3. There is no market for such material for use as fill material.
4. It also appears that continued operation would depend on the ability to return the water off the ponds to the adjacent stream rather than return it to the plant.

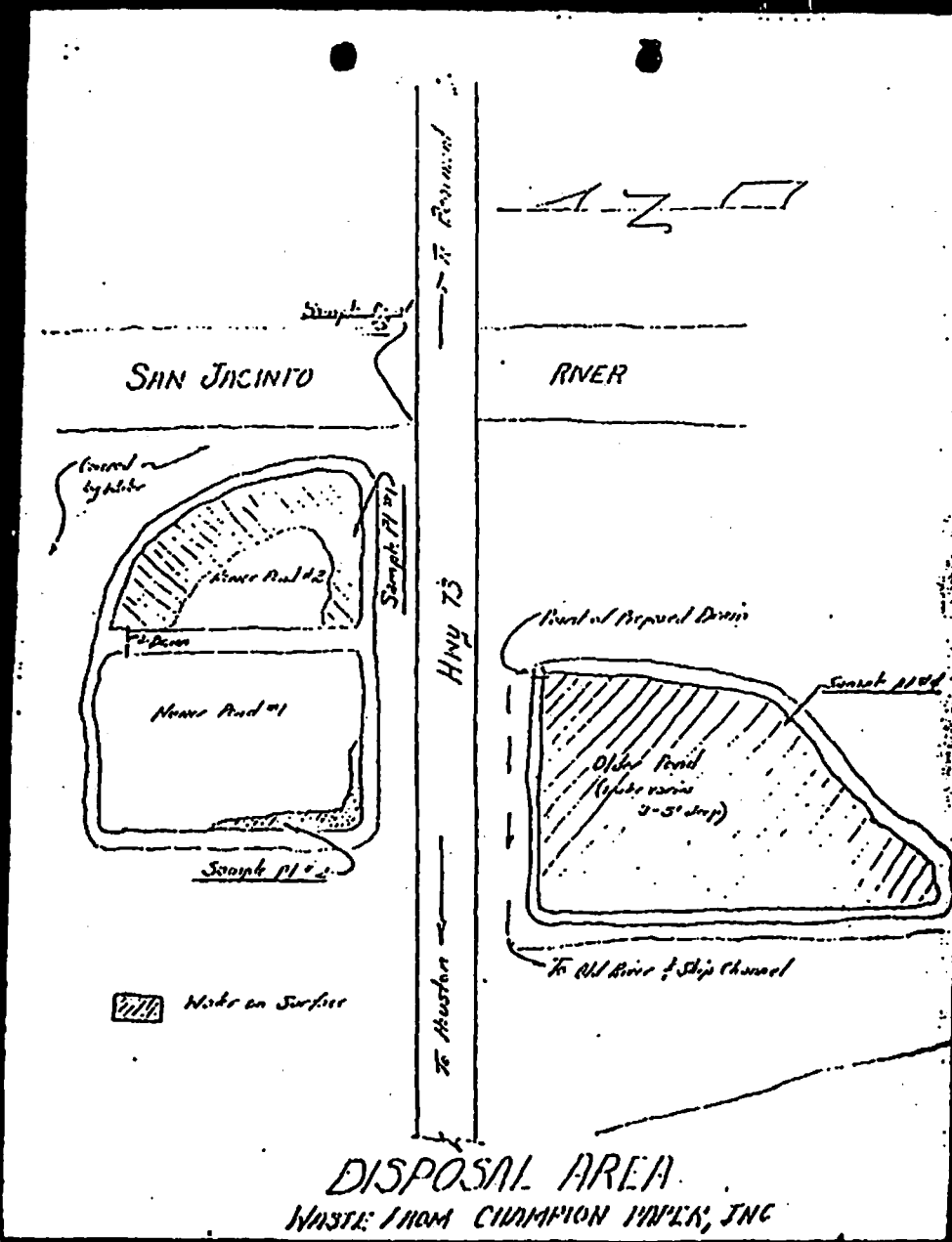
The operation and the need for submitting an application for a permit from the LCA was discussed with Mr. Henderson and Mr. McGinnis, and it is understood that such a permit would be obtained by Mr. McGinnis rather than by Champion. There is apparently the thought, or plan, that Mr. McGinnis would obtain the permit and handle the wastes from Champion under contract (the present set-up) and then also take care of such other industrial wastes that he might be able to handle (not from Champion).

It is the writer's understanding that nothing was to be done in the way of a permit application until the results of the sample analyses were received. At that time, the company officials would get in touch with the WPCB and its staff to discuss the matter further and get the thinking of the Board in light of the sample results. By that time, the companies should also have information regarding the chemical content of the material. It was felt that this would be the best approach to the matter since the present cycle of operation was essentially completed and time would be available to either obtain a permit for the operation - or work out a different method of disposal prior to the need for renewed removal of the waste material.

Respectfully submitted,

*Stanley K. Thompson*

Stanley K. Thompson, P.E.  
May 6, 1966





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**Figure B-1**  
1962 Aerial Photograph  
SJRWSP Soil SAP Addendum 1  
SJRWSP Superfund/IPC





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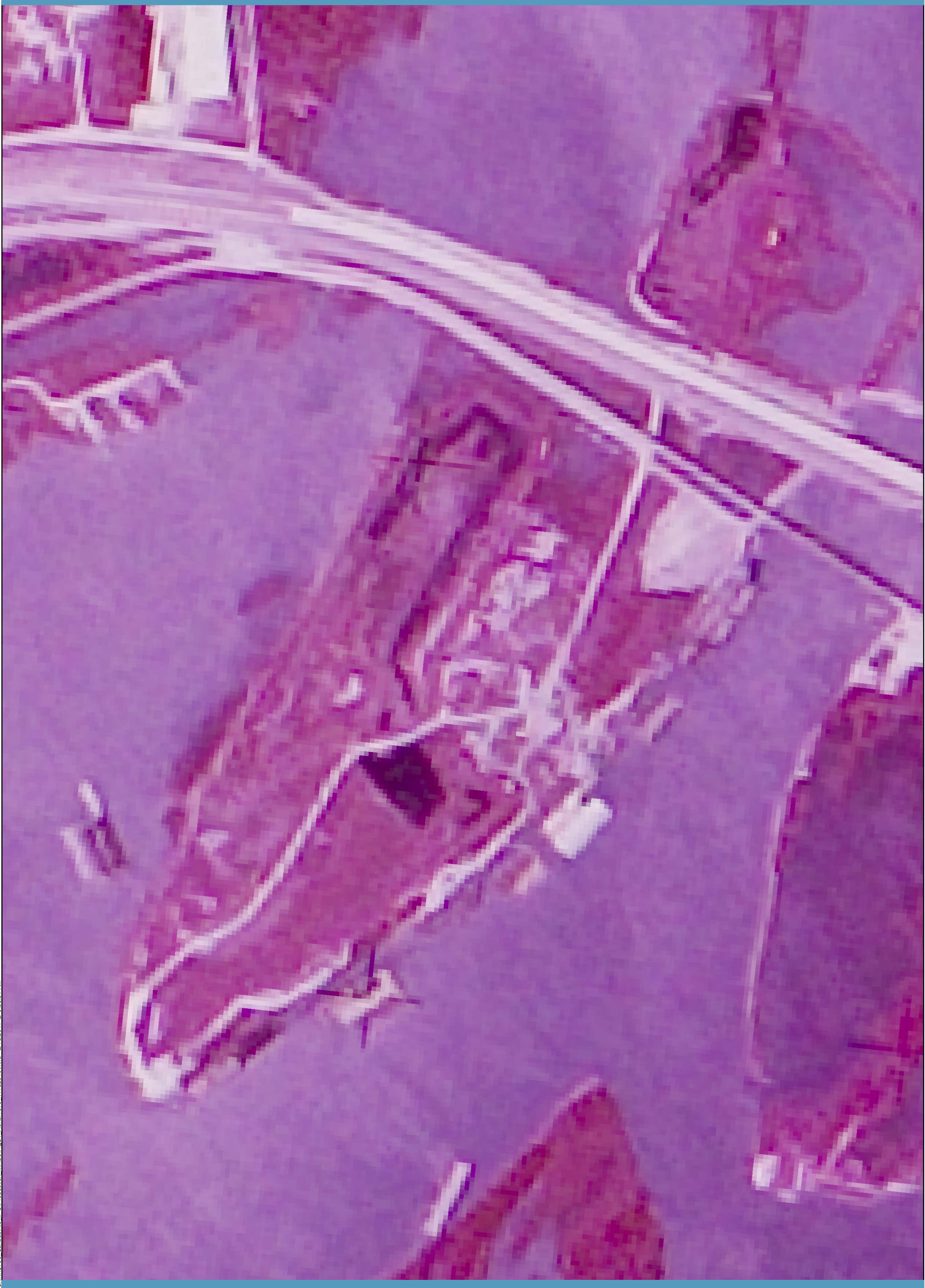
**Figure B-2**  
1964 Aerial Photograph  
SJRWP Soil SAP Addendum 1  
SJRWP Superfund/IPC



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**Figure B-3**  
1966 Aerial Photograph  
SJRWSP Soil SAP Addendum 1  
SJRWSP Superfund/IPC





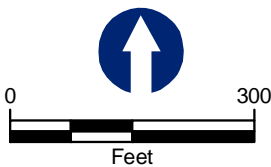
S:\m\2760 San Jacinto IPC\Production MXDs\FigB4 Aerial1970 11152010.mxd - 2/16/2011 @ 9:38:31 AM

**Figure B-4**  
1970 Aerial Photograph  
SJRWSP Soil SAP Addendum 1  
SJRWSP Superfund/IPC





S:\m\0760 San Jacinto IPC\Production MXDs\FigB5 Aerial1973 11152010.mxd - 12/15/2010 @ 11:41:50 AM



**Figure B-5**  
1973 Aerial Photograph  
SJRWSP Soil SAP Addendum 1  
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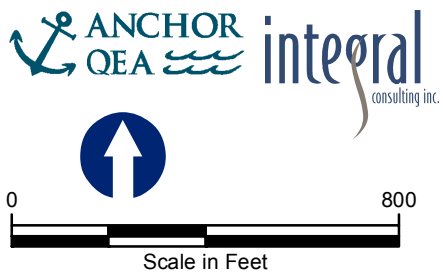
S:\m\2760 SanJacinto IPC\Production MXDs\FigB6 Aerial\1973\_1964\_11152010.mxd - 2/16/2011 @ 9:40:41 AM

**Figure B-6**  
1964 and 1973 Aerial Photographs  
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P:\Projects\C760\_SJWaste\_IPC\Production\_MXD\sfgrb\_7\_lidar\_hillshade.mxd - 2/16/2011 @ 10:01:53 AM



- Approximate impoundment boundary derived from historical TSDH drawings.
- Boundary of a flooded area that is visible in a 1966 aerial photograph
- The smaller of two approximate impoundment boundaries proposed by EPA on the basis of a 1964 aerial photograph.
- The larger of two approximate impoundment boundaries proposed by EPA on the basis of historical drawings by the TSDH.
- USEPA's Preliminary Site Perimeter
- Original (1966) Perimeter of the Northern Impoundments

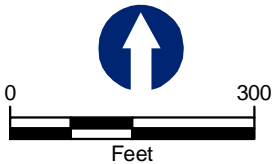
<sup>a</sup> Designation of the sand separation area is intended to be a general reference to areas in which such activities are believed to have taken place based on visual observations of aerial photography from 1998 through 2002.  
FEATURE SOURCES: Aerial Imagery: 0.5-meter. Photo Date: 01/14/2009 (StratMap) TNRS.

**Figure B-7**  
2008 LiDAR Hillshade  
SJRWSP Soil SAP Addendum 1  
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**Figure B-8**  
Google Earth Aerial Extracted 12-15-2010  
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**Figure B-9**  
 1964 and 2010 Aerial Photographs  
 SJRWP Soil SAP Addendum 1  
 SJRWP Superfund/IPC



APPENDIX C  
USEPA COMMENTS ON SJRWP  
SAMPLING AND ANALYSIS PLAN  
ADDENDUM 1: SOIL STUDY AND  
RESPONSES

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USEPA Comments on SJRWP Sampling and Analysis Plan Addendum 1: Soil Study and Responses

Comment No.	Section	Page	Line	Comment	Response to Comment - Proposed Revision
<b>Draft SAP Addendum 1: Soil Study</b>					
1	General			To minimize confusion associated with potential addendums that may be needed for both the areas north of I-10 and south of I-10, we recommend approaching the southern impoundment as a separate operable unit with its own sampling plan and associated addendums.	Comment noted. According to agreement during a teleconference meeting on February 4, 2011, a determination of whether the area south of I-10 should be a separate operable unit will be made after the present study is complete.
2	Whole document			<p>This southern impoundment sampling plan is based on interpretations in Section 1.4.1.3 Changes Over Time, which are made by Respondents based on evidence that could make sense, but there are other interpretations as well (see alternative regulatory interpretation below).</p> <p>Thus, the sampling plan for the southern impoundment should cover the entirety of the possible contaminated area, rather than relying on interpretations which may not be in consensus between the Respondents and regulators. Essentially, due to the uncertainties associated with different interpretations on the historical physical changes, both Areas 4a and 4b should be in the <i>initial</i> sampling effort for the Southern Impoundment Area, not just Area 4a and then potentially Area 4b.</p> <p>Alternative Regulatory Interpretation:</p> <p>The area termed the Southern Impoundment Area, south of I-10, comprises Modern-Holocene and Pleistocene abandoned channel, meander belt (point bar) and overbank depositional environments (BEG, 1972).</p> <p>Figure 3 is a 1966 USGS aerial photograph of the subject area. North of IH-10, stacked meander belt point bar deposits are clearly visible on the inside bend of the San Jacinto River. One such deposit can be traced (as a stand of vegetation) to the south side of I-10 into the northeastern—most triangular area that lies between the approximate impoundment area and the San Jacinto River.</p> <p>Other stacked point bar deposits that are visible immediately west of those described in the preceding paragraph do not appear south of I-10 in the area described as the “approximate impoundment boundary...”. Instead, as is visible in Figure B-1 in Appendix B, the lighter-hued deposits appear to overlie the natural sediments as early as 1962 and are not considered to be natural.</p> <p>The outline of this boundary of the lighter-hued deposits is coincident with the site plan drawing of the boundary for the south waste pond that appears in the figure in TSDH (1966). Thus, the area containing lighter-hued deposits and which is labeled “approximate</p>	The Respondent recognizes that there are alternative interpretations of the historical aerial photograph archive. Text in Section 1.4.1.3 will be revised to note this, and to direct the reader to this comment (i.e., in this Appendix) so that the alternative interpretation can be reviewed directly. Please note, however, that the change in the color of vegetation south of I-10 cited in paragraph four of this comment is visible in a 1957 photograph shown in Figure 2-20 of the RI/FS Work Plan, indicating that the change took place prior to any waste disposal that has been documented for that area. Additionally, the statement that “the outline of this boundary of the lighter-hued deposits is coincident with the site plan drawing of the boundary for the south waste pond that appears in the figure in TSDH (1966)” is not accurate. The lighter-hued deposit covers nearly the entire upland area south of I-10, whereas the drawing in TSDH (1966) is clearly a sub-area: the boundaries of the actual upland area with the river channel are shown in the drawing, and are not coincident with the boundaries of the pond (Appendix B).

USEPA Comments on SJRWP Sampling and Analysis Plan Addendum 1: Soil Study and Responses

Comment No.	Section	Page	Line	Comment	Response to Comment - Proposed Revision
				<p>impoundment boundary...” should be included within the area comprising the Southern Impoundment.</p> <p>This results in the area comprising of the Southern Impoundment to correspond to Area 4a plus Area 4b, and as such, both Areas should be in the <i>initial</i> sampling effort for the Southern Impoundment Area.</p> <p>References:  BEG 1972 <i>Environmental Geologic Atlas of the Texas Coastal Zone: Galveston - Houston Area</i>, Bureau of Economic Geology, The University of Texas at Austin, Austin, TX, 91 pp.</p> <p>TSDH 1966 <i>Investigation of Industrial Waste Disposal – Champion Paper, Inc.</i>, Inter-Office report, Texas State Department of Health, May 6, 1966.</p>	
3	Whole document			<p>Cores (i.e., Section 1.9.1.2, Section 2.1, Section 2.2.2, notes on Figures, etc): Cores for nature and extent characterization needs to be collected to a minimum of 5’ into native materials. Please revise text accordingly.</p>	<p>The design will be modified as requested. The deepest increment will be represented by a composite sample across the deepest 5 feet of the core, and will be collected entirely within native materials as indicated by grain size and other characteristics observable in the field and which indicate an absence of human disturbance.</p>
4	Section 1.4.1 Site Description and Section 1.6 Conceptual Site Model and Problem Definition			<p>The discussion indicates that sediments around the southern impoundment area are not contaminated with dioxins and furans to levels above background, suggesting that contamination from the southern impoundment has not been released to the aquatic environment. Please present a figure that depicts the sample locations and validated results of sediment data around the southern impoundment to support this discussion.</p>	<p>The requested figures will be provided.</p>
5	Section 1.4.1.3 Changes Over Time			<p>Please revise this whole section to include the alternative regulatory interpretation or summarize both interpretations with the main point being that uncertainties remain regarding historical physical changes; thus, both Areas 4a and 4b shall be in the <i>initial</i> sampling effort for the Southern Impoundment Area, not just Area 4a and then potentially Area 4b.</p>	<p>The section will be revised to acknowledge that there are uncertainties about the Site history for the south impoundment, and will direct the reader to the text of comment 2. Later sections will indicate that sampling will be performed in the area east of Market Street, which is the area of interest under the alternative regulatory interpretation of the site history, in the initial sampling event, and the figure showing sample locations will be modified to show that one or more additional stations within Area 4b may be sampled in the future.</p>
6	Section 1.6 Conceptual Site Model and Problem Definition			<p>Figure 4 needs be modified to reflect a possible soil runoff pathway to surface water and sediment, even if it is indicated as unknown (as is indicated by the data gap discussion in Section 1.7.3).</p>	<p>Figures showing the conceptual site model will be modified as requested.</p>

## USEPA Comments on SJRWP Sampling and Analysis Plan Addendum 1: Soil Study and Responses

Comment No.	Section	Page	Line	Comment	Response to Comment - Proposed Revision
7	Section 1.8 Task Description			<p>Please revise text to reflect that both Areas 4a and 4b shall be in the <i>initial</i> sampling effort for the Southern Impoundment Area, not just Area 4a and then potentially Area 4b.</p> <p>Also, the text should be expanded to acknowledge that future sampling (beyond this <i>initial</i> sampling effort), if necessary, will be preceded by some sort of SAP.</p>	<p>Please see the response to comment 5.</p> <p>The possibility of future sampling will be acknowledged throughout the text, and the requested statement regarding documentation will also be included in this section.</p>
8	Section 1.9.1.3 Performance of Risk Based Screens			<p>Please delete ‘... in a majority of samples...’ from this paragraph: “COI concentrations in each sample from surface and shallow subsurface increments will be compared to screening levels protective of human and ecological receptors. Those COIs with concentrations in a majority of samples that exceed screening levels will be addressed by a risk evaluation”.</p>	<p>The requested change will be made. However, rather than initiate a full risk evaluation when one sample exceeds a screening value (which is the resulting meaning when the change is made), the text and related figure will be revised to indicate that, following the receipt and review of validated data from this study, a decision about the path forward will be made in consultation with EPA. Considerations will include (but not be limited to) the magnitude of exceedance of screening levels, the number of exceedances, and the spatial (vertical and lateral) distribution of chemicals.</p> <p>This approach is consistent with agreement reached between USEPA and the Respondent at a teleconference to discuss these comments on January 25, 2011.</p>
9	Section 1.9.2.2 Surface Topography			<p>Revise text to reflect that field activities may be required to augment the LiDAR data, and strike the sentence that no field activities will be required.</p>	<p>During a teleconference to discuss these comments between USEPA and the Respondent on January 25, 2011, Respondent clarified that the intent of this text is to inform the reader that no field protocols are described in the Field Sampling Plan for this study. Therefore, the revision to the text will indicate that no related field work is currently planned.</p>
10	Section 2.1, Sampling Design, Sample Stations			<p>Please change surface and shallow subsurface sample stations SJTS034 and SJTS035 to soil cores stations. These particular locations were in the ponded area, based on the alternative regulatory interpretation of the 1966 aerial photo.</p>	<p>These stations will be changed and sampled as cores. According to an agreement with EPA at a teleconference meeting on the subject on February 7, 2011, all core intervals at these stations will be analyzed for dioxins and furans only, total organic carbon, and grain size. At each interval, enough sample will be collected so that all COIs can be analyzed if a risk assessment is warranted.</p>
Additional comment Feb. 9 and Feb. 14, 2011				<p>Feb. 9, 2011. Please see below response from Ann Strahl:</p> <p>"If Aroclors are identified as COCs at the site, then Aroclor analysis is appropriate. If the concern at the site includes the contribution from dioxin-like PCB congeners to the total 2378-TCDD TEQ, then PCB congener data will be needed. If the dioxin-like PCBs are of concern and if Aroclor analyses are being used to screen samples, then the level of concern for the dioxin-like PCBs relative to the 2378-TCDD TEQ should be calculated to determine if the sensitivity in the Aroclor analysis is adequate for screening PCB data for this purpose. For example, if the Aroclor results come back as not detected at ~25 ug/kg (taking into</p>	<p>Currently, there are no COCs (chemicals of concern) identified for this Site, so neither Aroclors nor PCB congeners are COCs. Similarly, dioxin-like PCBs, or their contribution to the total TEQ, are not specifically “of concern” at the Site, since no data are available for the area south of I-10, and no screening has been conducted. On the basis of the sediment study north of I-10, it is known that of the 12 dioxin-like PCB congeners analyzed in sediment samples collected within the impoundments north of I-10, including within the waste material, 10 were detected in the majority of samples, but only two congeners (two that were rarely detected) exceeded cancer risk-based</p>

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Comment No.	Section	Page	Line	Comment	Response to Comment - Proposed Revision
				<p>consideration percent moisture in soil), can the data user conclude the dioxin-like PCB congeners, if present, are not likely to be at concentrations of concern when Aroclors are not detected in a sample? "</p> <p>Feb. 14, 2011. Tracie agrees with Ann Strahl. Tracie also would like to remind that she previously submitted the comment for the Sediment SAP:</p> <p><b>From Section 1.6.2-Human Health Risk-Based Screen Comment</b> It is unclear if total PCBs were screened out using congener specific data or aroclor data. Due to the potential for weathering to cause aroclors not to be detected when PCBs may in fact be present, the TCEQ may consider congener specific analysis of PCBs prior to being screened out on aroclor analysis.</p>	<p>screening concentrations for individual congeners, and exceedances by detects occurred at only two locations, both within the northern impoundments. All but one station had TEQ<sub>PCB</sub> concentrations below the reference envelope value for sediment. This information is presented in the COPC (Chemicals of Potential Concern) Technical Memorandum (Integral 2011<sup>a</sup>). On the basis of this information, and given that the source of any wastes that may have been deposited south of I-10 would have been the same as the source for wastes north of I-10, it would not be appropriate to assume that PCBs are generally "of concern," either on their own or additive with dioxins and furans.</p> <p>Also, the screening value for total PCBs that will be used for comparison with the sum of Aroclors (220 µg/kg) is highly conservative (it is the Regional Screening Level [RSL] value for "polychlorinated biphenyls, high risk" for residential soils<sup>b</sup>), and accounts for cancer risk attributable to PCBs. The cancer risk addressed by the screening level is the same cancer risk resulting from activation of the aryl hydrocarbon (Ah-) receptor mediated pathways that provide the basis for calculation of toxic equivalency factors (TEFs) and of TEQs. In other words, the RSL for total PCBs inherently addresses "dioxin-like" toxicity of PCBs, even though the means of accounting for concentration and exposure are different (i.e., not TEQs). The answer to Ann Strahl's question ("...can the data user conclude the dioxin-like PCB congeners, if present, are not likely to be at concentrations of concern when Aroclors are not detected in a sample") is "yes," because the sum of Aroclors at their respective detection limits will be below the cancer risk-based screening level, the residential RSL, which addresses carcinogenicity of PCBs, whether or not they are considered to be "dioxin-like."</p> <p>The approach that will be used in collection of soils in Area 4 of the Site will be to submit samples for analysis of Aroclors for the purposes of screening, and to collect and archive enough sample for analysis of PCB congeners if a risk assessment is deemed necessary. This addresses TCEQ's requirement that the sensitivity of the Aroclor analysis is adequate for screening PCB data to determine whether PCBs could make a significant contribution to cancer risk that should be addressed in a risk assessment, even if Aroclors are not detected. It also provides a conservative approach that is appropriate for a screening evaluation.</p>

a. Integral, 2011. Draft COPC Technical Memorandum, San Jacinto River Waste Pits Superfund Site. Prepared by Integral Consulting Inc. Seattle, WA  
b. USEPA, 2010. [http://www.epa.gov/reg3hwmd/risk/human/rb-concentration\\_table/Generic\\_Tables/pdf/ressoil\\_sl\\_table\\_run\\_NOVEMBER2010.pdf](http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/Generic_Tables/pdf/ressoil_sl_table_run_NOVEMBER2010.pdf)